

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION**

TRS Renewal of State Certification )  
Application, State of Missouri. )

CG Docket No. 03-123

**APPLICATION FOR RENEWAL OF CURRENT**

**MISSOURI TRS CERTIFICATION**

Respectfully submitted,



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# Missouri Telecommunications Relay Service FCC Certification Renewal Application and Supporting Documents

## I. Introduction

The Missouri Public Service Commission ("MoPSC"), with the assistance of Sprint Relay ("Sprint"), has prepared this Application for Renewal and the attached appendices to comply with the Federal Communications Commission ("FCC") Telecommunications Relay Services ("TRS") Certification Renewal Application. This application will establish, as required by the **FCC Public Notice DA 07-2761, CG Docket No. 03-123**, released on June 22, 2007, that the Missouri TRS Program (1) meets or exceeds all operational, technical, and functional minimum standards contained in 47 CFR § 64.604; (2) makes available adequate procedures and remedies for enforcing the requirements of the state program; and, (3) where our program exceeds the mandatory minimum standards contained in §64.604, it in no way conflicts with federal law.

The MoPSC also certifies that it has and will continue to comply with the ADA's standard relay guidelines and will oversee its current TRS provider, Sprint, to ensure that all requirements are met.

## II. Background

In 1990, the Missouri legislature enacted House Bill Nos. 1132 and 1315 to establish a program to provide 24-hour per day, seven-day per week TRS to relay conversation between people who use a Text Telephone ("TT" or "TTY") and those using the general communications network. This legislation resulted in a program known as Relay Missouri.

The MoPSC is the administrative authority that oversees the Missouri TRS. The legislation established the method of funding the TRS as a surcharge, and mandated that the MoPSC complete its initial investigation into the feasibility of providing TRS within six months of July 10, 1990.

On October 16, 1990, the MoPSC approved a draft request for purchase to be forwarded to the Office of Administration, Division of Purchasing, which in turn led to a contract with Sprint to provide Missouri with unrestricted telecommunications relay service. The State of Missouri and Sprint reached an agreement to begin operations of Relay Missouri. On June 8, 1991, Missouri TRS began serving residents of Missouri from its Independence, Missouri site. The relay service is accessible via a toll-free number, 1-800-735-2966 (TT/TTY) and 1-866-735-2460 (voice), as well as via "711." On June 23, 2004, the MoPSC amended its agreement with Sprint to include providing Captioned Telephone services. Currently Missouri TRS supports single-line and two-line *CapTel*. *CapTel* phones automatically contact the *CapTel* call center when a caller wishes to place a captioned call. Persons calling single-line *CapTel* services users must first dial 877-243-2823 while persons calling two-line *CapTel* users need only dial the user's home number.

A 12-member Advisory Committee, the Relay Missouri Advisory Committee (the "Advisory Committee"), was established to monitor the ongoing provisions of the relay service to its users. The Advisory Committee was expanded to 14 members in 2001 and currently consists of seven representatives from the deaf, late-deafened, hard-of-hearing, hearing and speech-impaired communities; an audiologist or speech pathologist; one representative each from the Missouri

Commission for the Deaf, the TRS vendor, the Missouri Office of the Public Counsel and the Missouri Telecommunications Industry Association; and two representatives from the MoPSC.

The Relay Advisory Committee assists in evaluating promotional efforts, responds to complaints and/or needs of the deaf, hard-of-hearing and speech-impaired communities; acts as a liaison between the contractor and the deaf, hard-of-hearing, and speech-impaired communities, and responds to and evaluates the need for relay service enhancements that may improve the efficiency of the service. The Advisory Committee may then make recommendations to the MoPSC for its consideration and ultimate resolution.

Missouri's Adaptive Telephone Equipment Program ("ATEP") began on July 1, 1997. The ATEP provided adaptive telephone equipment to individuals with disabilities so that they may obtain basic telephone access. Basic telephone access did not include access to optional features such as the equipment to use Caller-ID or computers to access the Internet.

Effective August 28, 2000, SB 721 modified and transferred the ATEP program to the Department of Labor and Industrial Relations but in 2005 the ATEP was assigned to the Department of Elementary and Secondary Education. For the FCC's convenience, we have enclosed a copy of Missouri Senate Bill 721 as Attachment A.

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### **III. Operational Standards**

#### **A.1. Communication Assistants (CAs)**

***§64.604 (a)(1)(i) TRS Providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communication needs of individuals with hearing and speech disabilities***

##### **CA Employment Standards:**

Sprint has established a successful procedure to attract qualified applicants for TRS CA positions. The first step in the CA's hiring practice is a validated test that screens for typing, language skills, and other skills related to the CA position. When an applicant passes the test, a Human Resources representative screens the applicant over the phone or in person, for oral communication skills and work availability. If the applicant passes this step, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a CA. If the supervisor recommends the applicant for employment, the applicant undergoes a drug screen and security/reference check. This process ensures that only qualified applicants are hired to work at a relay center.

Sprint IP ("Internet Relay") CAs follow the same employment and training standards as TRS CAs. In addition, Sprint provides an enhanced VCO service called Captioned Telephone ("*CapTel*") Services. Sprint requires that all *CapTel* CAs have a high school graduate equivalency as a minimum qualification for the job.

All Sprint Video Relay ("VRS") Interpreters are qualified and adhere to the Registry of Interpreters for the Deaf ("RID") Code of Professional Conduct. See Attachment B.

***§64.604 (a)(1)(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.***

##### **Communication Assistants Training Program:**

Sprint trainers use adult learning theories; training is adapted to each participant's learning modality; incorporating lecture, visual graphics, flow charts, videos, role playing, and hands-on-call training, to stimulate the CA's ability to learn.

New hires receive training in Deaf Culture, ASL translation, the needs of non-signing deaf individuals, and sensitivity to the needs of persons with hearing and speech disabilities by a qualified person who, if not deaf or hard of hearing, possesses extensive knowledge in this area. During the CA's initial training, they are trained and evaluated on how to accurately reflect the TTY user's communication and on the CA's role in the relay process. CAs' performance based skills such as grammar, spelling, and oral communication abilities, are evaluated. Sprint works closely with local deaf and hard of hearing communities to identify knowledgeable presenters to assist with the training. Sprint utilizes videos, role-playing, group activities and discussion groups to educate employees on the different needs of their customers to ensure sensitivity towards customers.

Additionally, applicants are given written and hands-on evaluations to demonstrate their ability to spell and type accurately, process a call using live training terminals, and role-play in varying levels of ASL. CAs also receive extensive training on how to improve their interpersonal skills so that they can work effectively with difficult and stressful situations that may arise during their employment. These training mandates and skill expectations also apply to Sprint IP CAs and

VRS interpreters where appropriate. Please review the Sprint TRS, Speech to Speech ("STS"), *CapTel* and VRS Training outlines in Attachment B.

A team of ASL-fluent Sprint employees developed the ASL Training workbooks that are utilized by CAs for ongoing training. These workbooks have been designed to provide supplemental training and to assist CAs toward the mastery of ASL translation on relay calls.

### **Captioning Assistants Training Program:**

*CapTel* CA training includes comprehensive training on the *CapTel* Service Workstation equipment and other instruction including some live call handling experience. All prospective CAs are required to meet all of the CTI standards for becoming a production CA. These standards include the ability to consistently meet call handling skills such as WPM averages, accuracy averages as well as attendance and attitude standards as set by *CapTel* management. At any time if a prospective CA does not demonstrate the ability to achieve the expected standards, they may be removed from the training group and terminated. See Attachment B.

All *CapTel*/CAs are tested for typing, grammar, and spelling competency to ensure their skills meet FCC Guidelines. *CapTel* CA training provides familiarity with hearing, deaf, and speech-disabled cultures. A captioned telephone user does not type while making a call, therefore, there is never an opportunity for the CA to have to interpret typewritten ASL.

*CapTel*/CAs must follow the following guidelines while supporting calls:

- 1.1 The CA shall be trained to caption the words spoken by the hearing party as accurately as reasonably possible, without intervening in the communications. The CA is permitted to provide background noise identification.
- 1.2 The CA shall not maintain any records of conversation content and shall keep the existence and content of all calls confidential.
- 1.3 The CA shall meet the FCC standards for TRS minimum transcription speed.
- 1.4 The CA shall not limit the length of a call and shall stay with the call for a minimum of ten minutes when answering and placing a call.
- 1.5 The CA shall pass along a *CapTel*/caller's Automatic Number Identification ("ANI") to the local Public Service Answering Point ("PSAP") if the caller disconnects before being connected to emergency services.
- 1.6 Personnel supporting *CapTel* shall have the requisite experience, expertise, skills, knowledge and training and education to perform *CapTel* Services in a professional manner.

See Attachment B, Sprint's Training Outlines, for more information on CA training requirements.

### **CA Quality Assurance Programs:**

**Monthly Surveys:** Sprint Relay conducts monthly surveys and formal reviews to monitor and evaluate the continuing training for Sprint Relay TRS CAs as well as Sprint IP CAs. The survey process used is a product of a task force comprised of management staff. It evaluates all areas of work performance, personal effectiveness and attendance. The survey process goals are to respond to customer feedback and provide the CA with clearly defined and objective performance measures. Two surveys are completed on each CA every month and include areas such as Typing Accuracy, Spelling, Conversational English/ASL Translation, Clarity/Enunciation, Caller Control, and Etiquette/Composure.

**Quality Assurance Test Calls:** To ensure that all CAs are focused on FCC requirements and state contractual commitments, Sprint centers, and/or an independent third party quality testing firm retained by Sprint, have performed a total of 700 test calls. Results are provided on a quarterly basis. Feedback and appropriate guiding performance measures for specific components are addressed with each CA. Sprint Relay also conducts test calls to ensure *CapTel* quality at least once a quarter, but often conducts monthly tests of 100 test calls on *CapTel*.

**Relay Program Management and Trainer Test Calls:** Additionally, the Operations department and members of the Relay Program Management Team identify areas of concern based on customer feedback, state feedback, individual survey results and customer contacts. Approximately 300 test calls per month are conducted focusing on the identified monthly call-processing topic. Results are compiled and shared with Operations' management. Based on the results, the trainers and management determine if refresher training is required and what method will be used for delivery. Sprint Relay and the Relay Program Management team also perform test calls for *CapTel*/CAs.

***§64.604 (a)(1)(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.***

**Transmission of 60 WPM:** All Sprint Relay CAs type a minimum of 60 words per minute ("WPM"). Sprint Relay utilizes an oral-to-type test that simulates actual working conditions. CAs are tested on an ongoing basis to ensure that a 60 WPM performance requirement is maintained. During this test, Sprint Relay does not use technology-aided transmission to ensure the typing speed. The scores for each CA are the actual words per minute that are typed. The most recent test results were an overall 82.5 WPM with 97% accuracy for all call centers. This applies to Sprint IP and IP wireless relay CAs as well. Sprint Relay utilizes technological aides during relaying such as pre-programmed macros and auto-correcting software, along with the CA's natural skill, to provide optimal service. *CapTel*'s voice recognition technology transmits above 100 WPM. While oral to type tests are waived as a result of this technology, oral to text tests are given to all *CapTel*/CAs.

***§64.604 (a)(1)(iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.***

**Qualified VRS interpreters:** All VRS Interpreters are qualified and adhere to the RID Code of Professional Conduct. See Attachment B about VRS interpreter qualifications and training.

***§64.604 (a)(1)(v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.***

**In-Call Replacement of CAs:** Sprint Relay requires all CAs, including Sprint IP and IP Wireless CAs, and VRS Interpreters, also known as Video Interpreters (VIs), to stay on the call for a minimum of 10 minutes, with the exception of STS CAs, who must stay on the call for a minimum of 15 minutes. This is included in the CA training matrix, Attachment B, Module 4I, and the VRS Training Outline and Qualifications. *CapTel*/CAs also stay on all calls for a minimum of 10 minutes.

***§64.604 (a)(1)(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.***

When a Sprint relay user requests a CA of the opposite gender of the CA who initially receives the call, the relay user is switched to an appropriate CA as soon as one becomes available. If a change of CA is necessary during the call, every attempt will be made to accommodate the previous gender request. When a Sprint VRS and Sprint IP or IP Wireless user requests a specific gender, every attempt will be made to honor the request. If a change of VIs is necessary during the call, every attempt will be made to accommodate the previous gender request. *CapTel* CAs are waived from this requirement. See Attachment K, FCC *CapTel*/Mandatory Minimum Standards & Compliance Matrix.

***§64.604(a)(1)(vii) TRS shall transmit conversations between TTY and voice callers in real time.***

Sprint CAs transmit and relay all conversations between the caller and the called parties in real time. *CapTel* is a transparent service. CAs transmit audio and captioned text conversations from the voice caller to the *CapTel* user in real time. Since the *CapTel* user utilizes their own voice to transmit, no transmission occurs from the CA to the voice caller.

## **A.2. Confidentiality and Conversation Context**

***§64.604 (2)(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.***

**Confidentiality Policies and Procedures:** Sprint Relay believes that measures to ensure confidentiality are crucial to the success of TRS, Sprint IP/IP Wireless and VRS operations and has implemented procedural and environmental measures to safeguard customer and call information.

In accordance with the FCC regulations, all information provided for the call set-up, including customer database records remain confidential and cannot be used for any other purpose. Once the inbound party disconnects, CAs and VIs lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept once the call is released from the Relay position. Billing information is transferred to billing files after the call has been terminated and is no longer available except for billing purposes.

The only exception to this policy relates to STS calls. Sprint STS Relay Agents may retain information from one inbound call for use in a subsequent outbound call, with the caller's permission. Such information will only be retained for the duration of the inbound call.



Sprint Relay's confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. Sprint strictly enforces confidentiality policies in the Center, which include the following:

- Prospective CAs and VIs undergo a thorough background investigation and screening.
- During initial training, CAs and VIs are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs and VIs receive training on healthy detachment.
- Breach of confidentiality will result in disciplinary action up to and including termination of employment.
- CAs perform their work in cubicles that are bordered by high sound-absorption acoustic tiles and wear special noise reducing headsets.
- All Sprint Relay Centers have security key access.
- Visitors are not allowed in Relay work areas.
- Supervisors are present in the work area to observe behavior.
- All Relay Center personnel are required to sign and abide by the Sprint Relay Center's Agreement Regarding Confidential Customer Information.
- All employees attend annual confidentiality meetings wherein the confidentiality agreement is reviewed and re-signed.

Sprint Relay Center's Agreement Regarding Confidential Customer Information requires CAs and VIs:

- Keep all call information confidential.
- Not edit or omit any content from the conversation.
- Not add or interject anything into the content or spirit of the conversation.
- Assure maximum user control.
- Continuously improve their skills.

See Attachment C, TRS Pledge of Confidentiality. This document is similar to what is used for Sprint VRS interpreters and IP/IP Wireless CAs.

*CapTel* captioners must comply with all confidentiality rules applicable to TRS. The *CapTel* confidentiality form is similar to TRS. Below is an explanation of confidentiality as it pertains to *CapTel* captioners. See also Attachment C, the *CapTel* confidentiality form signed by *CapTel* CAs.

Information obtained during a *CapTel* call should not be shared with any person except a member of the *CapTel* management staff who has asked for specific information. This information may be needed to clarify technical, policy, emergency, venting, consumer, or customer service issues. General call information will not be shared unless it is used to clarify, vent, or teach. Information about call content should be discussed in a private area only.

Only information critical to resolving the situation will be disclosed. This may include consumer name, name of business/agency, gender of caller, type of call (voice in, *CapTel* in), day of week, time of day, city, state, or any other details that could in some way identify a consumer.

A Captionist may have the need to "vent" about a call due to problems, complaints or stress from handling the call. The Captionist may ask to speak to a supervisor or other member of management (as long as it wasn't their call) in a private area.

The success of *CapTel* depends on quality and complete confidentiality. Since consumers will be less likely to use the service if they feel their personal and professional calls are not kept in the strictest confidence, all Captionists understand and abide by the confidentiality policy. Any Captionist who breaks this policy will be disciplined, up to and including termination.

**STS Limited Exception of Retention of Information:** At the request of a caller, Sprint Speech-to-Speech (STS) CAs will retain information from a call in order to facilitate the completion of consecutive calls. No information is kept after the inbound call is released from the CA position.

*§64.604 (2)(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.*

**Verbatim Relay and the Translation of ASL:** Sprint Relay CAs type to the TTY user or verbalize to the non-TTY user exactly what is said, verbatim, when the call is first answered, and at all times during the conversation, unless either relay user specifically requests summarization or ASL interpretation.

At the request of the relay user, Sprint Relay CAs will translate written ASL into conversational English. All Sprint Relay CAs are able to translate the typed languages of relay users whose primary language may be ASL or whose written English language skills are limited to conversational grammatically correct English. Training is provided on various levels of English/ASL during the initial training, as well as throughout a CAs' employment. In order to finish training successfully, the CA must demonstrate competent skills to translate the calls as requested.

Sprint VRS interpreters, Sprint IP/IP Wireless CAs and *CapTel* CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.

**STS Facilitation of Communication:** Sprint Relay STS CAs receive training on how to facilitate STS communication without interfering with the independence of the user. STS CAs' abilities to facilitate calls without altering conversational content or compromising the user's control of the conversation are evaluated monthly. Sprint Relay users have full control of all of their relay calls.

### A.3. Types of Calls

*§64.604 (3)(i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.*

**Sprint Relay Services:** Sprint Relay provides 24 hour, 7 day-a-week Telecommunication Relay Service (TRS) for standard (voice), Text Telephone (TTY), wireless, or personal computers (PC) users to place local, intrastate, interstate, and international calls. Sprint Relay also processes calls to directory assistance and to toll free numbers.

There are no restrictions on the duration or number of calls placed by any relay user. All relay users accessing Sprint Relay retain full control of the length and number of calls placed anytime through relay. Sprint IP/IP Wireless CAs and VRS interpreters are also prohibited from refusing single or sequential calls or limiting the length of calls using relay services.

*CapTel* CAs are currently waived for outbound calls because the *CapTel*/CA is not involved in the call set up and cannot refuse the call. *CapTel* users dial sequential calls directly, therefore, it is not possible for a *CapTel*/CA to refuse sequential calls or limit length of calls.

*CapTel* CAs are not waived by the FCC for inbound calls to a *CapTel* user made through a TRS facility. However, if a call is made directly to the captioned telephone access number no set up is involved and the *CapTel*/CA cannot refuse to call. See Attachment K for waiver information.

***§64.604 (3)(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call. (iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied. (iv) Relay services shall be capable of handling pay-per-call calls.***

Sprint Relay works in conjunction with the Local Exchange Enhanced Services to provide additional functionality for users of TRS. Sprint Relay processes collect and person-to-person calls and calls charged to a third-party as well as calls billed to prepaid and non-proprietary calling cards offered by the local or any other interexchange carrier. Sprint Relay will also process calls to or from restricted lines e.g. hotel rooms and pay telephones.

When a TRS or *CapTel* call is placed through Sprint Relay, the user will be billed in the same manner that a non-relay user would be billed. The relay user will only be billed for conversation time, (which does not include call setup time, time between calls and wrap-up time) on toll calls. Billing will occur within 60 days of the call date. Sprint Relay gives users the option of billing their calls to a non-proprietary LEC (local) or IXC (long distance) calling card. Sprint Relay will process calling cards offered by the user's carrier of choice if the carrier is a participant of Sprint's Carrier of Choice (COC) program and as long as Feature Group D is at the Carrier's access tandem. Sprint works with the LECs and IXCs to compile and make available to all TTY or *CapTel* users a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and available billing options and will also handle the rating and invoicing of toll calls placed through the relay. Sprint VRS, Sprint IP and IP Wireless are waived from these requirements. Please refer to the Sprint VRS and IP Report to the FCC, Attachment L.

***§64.604 (3)(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.***

Sprint Relay provides access to all available relay call types. A complete list of all call types provided by Sprint may be found in Attachment I Sprint Standard Features Matrix. Most call types are waived by the FCC for IP and VRS users. See also Attachment L.

Except where waived by the FCC, *CapTel* users are able to access all types of TRS calls. The requirement to provide 711 dialing is waived for outbound calls made from a *CapTel* phone. STS and HCO calls are also waived.

**§64.604(3)(vi) TRS providers are required to provide the following features: (1) call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.**

**Call Release Functionality:** TTY to TTY Call Release Functionality allows the CA to connect two TTY users and then drop off the line, leaving the two TTY customers connected. This is especially useful for customers needing to use a pre-paid calling card, reach another TTY user through a switchboard or operator, or when needing to speak with a voice user first. With 2-Line *CapTel* service, a *CapTel* user can release or receive captions at any time during a call.

**Frequently Dialed Numbers:** Frequently Dialed Numbers, sometimes referred to as Speed Dial Numbers, allow relay users to store up to 10 frequently called numbers in their customer preference database along with a name for each entry. When initiating a call the user can then provide the name to Sprint Relay CAs, instead of the entire 10-digit number. The *CapTel* Consumer Premises Equipment ("CPE" or *CapTel*/phone) is equipped with the ability to program in 3 speed dial numbers, and a recently dialed number.

**Three-Way Calling:** Customers who have purchased three-way calling from their LEC can use the feature when placing a call through Relay. This feature allows a customer to add a third party to a TRS call. For example, a TTY caller places a call to the Relay and then bridges another TTY person on his or her line. The original TTY caller then requests to place a call to a voice user. The CA will make the connection and Relay the call between the voice party and both TTY users. This process would also apply if there were two voice customers and one TTY user on the line.

Sprint *CapTel* users are also able to participate in a three way call. Although the person using the captioned phone is unable to establish the three-way call, the called party will be able to do so by utilizing the telephone switch hook (or "flash") button on his or her CPE. Thus, Sprint *CapTel* meets the requirement for three-way calling for users of One-Line *CapTel*. For Two-Line *CapTel*, either party can initiate a three-way call should the user purchase this as a LEC option. Sprint *CapTel* users are also able to participate in a conference bridge to speak to three or more individuals.

***§64.604(3)(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.***

When a Sprint Relay caller reaches an answering machine, voice mail or interactive menu, the CA informs the relay caller by hitting a macro which reads (ANS MACH) or (RECORDING) to keep the caller informed of the call progress. The CA then, if necessary, presses a hot key to record the voice announcement and relay the message back to the caller. The CA utilizes Sprint's recording technology to obtain all information necessary on the first attempt. The CA relays all of the recorded information to the customer and deletes the recorded message. This technology greatly reduces the CA work time, as the CA does not need to make multiple outdials. In addition, Sprint relay callers are only charged for the first call. Subsequent redials to leave a message or enter information into an interactive menu are not charged to the customers. Sprint has developed

a procedure using our Ultra WATS lines to ensure that with additional out-dials the customer does not incur toll charges.

*CapTel* users are able to hear and interact directly with the recorded message and make the selections as requested by the interactive menu. The *CapTel* user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.

*CapTel* users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The *CapTel* user interacts with the recorded message system directly. This is treated as one call.

Callers to Sprint relay services access 900 services by dialing a free 900 number to access relay. Use of a toll-free 900 number inbound to the relay center provides functionally equivalent access to the telecommunications network while preventing unauthorized end users from circumnavigating the LEC restrictions. This process ensures that the LEC will only complete those calls into the relay service that do not have a 900 number block added to their phone lines. The 900 service provider and the 900 number carrier(s) will rate and bill the user as if the call was dialed directly from the originating user's telephone.

Relay Missouri's current 900 number is (900) 230-6363.

***§64.604 (a)(3)(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.***

Sprint Relay TRS, Sprint IP/IP Wireless and VRS VIs provide both answering machine and voice mail retrieval. Please refer to Attachment I, Standard Call Features Matrix.

**Answering Machine:** Sprint Relay CAs will inform relay users when reaching an answering machine, voice mail or interactive menu. The CA will hit a "hot key" which reads (ANS MACH) or (RECORDING) to keep the caller informed of the call progress.

When reaching a recorded message, the CA utilizes Sprint's recording technology to obtain all information necessary on the first attempt. The CA can then play back the recording at a pace that allows them to relay the entire message to the caller, after which the recorded message is deleted. This technology greatly reduces the CA's work time and accordingly, time billed to the State.

The CA will type the entire outgoing message verbatim including the option for the Relay User to leave a message, if applicable. The CA will leave the relay user's message in the appropriate mode of communication. Sprint has the capability to leave messages in both voice, text and touch tones (pagers). Once the CA has left the message on the answering machine or voice mail, the CA will send a pre-programmed response to the relay caller stating:

**(UR MSG LEFT) CA XXXXM/F GA**

Subsequent redials to leave a message or enter information into an interactive menu are not charged to the customers. Sprint has developed a procedure using our Ultra WATS lines to ensure that with additional outdials, the customer does not incur toll charges. Customers will only be charged for the first call. *CapTel*/CAs are also equipped with the ability to retrieve messages stored on a local answering machine.

**Voicemail Retrieval:** Sprint has the capability to retrieve messages from answering machines by placing an outbound call to a remote location or the same location. When a user requests to retrieve messages at the same location, the CA will instruct the user when to take the handset off the hook and when to begin playing back the messages. The CA will retrieve all messages and relay verbatim. The recorded message will be automatically deleted by the system once the relay call is completed. The *CapTel* user both hears and interacts directly with the recorded message and makes the selections as requested by the interactive menu. The *CapTel* user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.

*CapTel* users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The *CapTel* user interacts with the recorded message system directly. This is treated as one call.

#### **A.4. Handling of Emergency Calls**

***§64.604 (a)(4) Handling of emergency calls. Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.***

Sprint Relay meets the requirements of emergency calls by immediately routing 911 calls to an appropriate Public Service Answering Point ("PSAP") that the caller would have reached by dialing 911 directly, or a PSAP that is capable of dispatching emergency services in an expeditious manner. With one CA keystroke, Sprint's intelligent CA application utilizes the NPA/NXX information of the inbound caller to immediately cross-reference this information to a national database containing the ten-digit emergency number for every PSAP. Within seconds, this number is entered in the dial window and the call is then immediately initiated.

Sprint Relay considers an emergency call to be one in which the user of the Relay Service indicates they need the police, fire department, paramedics or ambulance. Sprint utilizes a standard E911 database that serves all of the United States and has uniform procedures, as noted below, which are followed at every Sprint Relay Center.

- The CA, when told by a TTY/ASCII user (non-voice) that an emergency exists, will hit a hot key.
- The CA terminal will post a query containing the caller's ANI to the E911 database.
- The E911 database currently responds with the telephone number of an appropriate PSAP; automatically dials the PSAP number and passes the caller's ANI to the E911 Service Center.
- The CA will remain on the line and will verbally pass the caller's ANI to the E911 Service Center Operator.

Relay users will be encouraged to dial 911 as their primary means of contacting Emergency Services. However, if a Relay user makes an emergency call through Relay, the Sprint CA will make every effort to correctly route the call to an appropriate PSAP based on the network and user-provided information. As required by the FCC, CAs will remain on the line and give the

Emergency Service Provider the caller's telephone number, even if the caller is no longer on the line.

It is Sprint's opinion that in some emergencies, valuable time could be lost if the TTY call were to be transferred to the PSAP, and the results could be life threatening. Therefore, Sprint will allow direct TTY-to-TTY communication in the following scenarios, if allowed by the FCC:

- At the request of the caller,
- At the request of the PSAP Operator or PSAP Supervisor,
- The CA will remain connected and will silently monitor the call, if:
- The PSAP is not capable of receiving and conversing directly with the caller in the modality of the caller (i.e. if the caller is using a communication modality other than TTY, [i.e., VCO, HCO, STS, ASCII, VRS, or Internet Relay]), or
- The CA is having technical trouble transferring the call to the PSAP (i.e., the caller is disconnected from the PSAP; the PSAP cannot establish a TTY connection, etc.).

The CA will assist, as necessary, to maintain communications between the PSAP and the caller. Otherwise, the Sprint CA will remain on the line to provide assistance as necessary to facilitate communication for all emergency calls and will not disconnect until the call has been completed.

911 services are currently waived for IP and VRS providers. Sprint strongly encourages Internet Relay users to dial 911 directly to receive prompt emergency services via TTY or phone. Sprint IP via the website permits manual 911 processing. If a user tells the operator to dial 911, the operator will request supervisor assistance. The user will need to provide the address and city where he/she is calling from. The supervisor will call Directory Assistance (on a separate phone call) to obtain 10-digit emergency PSAP number. Then the supervisor will pass it to CA to make an outbound call to the 911 dispatcher (PSAP). It can take few minutes to get the information. Users are encouraged to enter a 10-digit emergency number on the website for more efficient call processing. See Attachment D for procedure for handling E911 calls, including *CapTel* calls.

**Telecommunications Service Priority Program:** Sprint announced on October 31, 2005, that it had completed all milestones in enrolling its TRS in the FCC's Telecommunications Service Priority ("TSP") program. On May 11, 2005, Sprint began implementing TSP throughout its network. On October 31, Sprint successfully activated all 14 call centers under the TSP program. Sprint's participation in the TSP Program strengthens their already robust reliability.

In 1988, the TSP program was established to prioritize the restoration of telephone service to critical facilities and agencies at times when telecommunications companies are typically overburdened with service requests, such as after a natural disaster. In the event of a regional or national crisis, the program restores telephone services most critical to national and homeland security on a priority basis.

The Sprint TRS network is designed to reroute traffic to other Sprint Relay centers across the country to provide uninterrupted service. However, if a national or regional emergency causes service to be disrupted and the relay call center is unable to receive or place calls, Sprint's participation in the TSP program means that Local Exchange Carriers ("LEC") are required to restore service to the relay call center as rapidly as possible consistent with the priority status assigned to the relay call center. Unlike other TRS providers, when a disaster occurs, Sprint TRS has the ability to reroute calls immediately to unaffected relay call centers and continue processing

calls with minimal customer impact.

The Sprint relay call centers participating in TSP are:

- Albuquerque Switch (Albuquerque, NM and Honolulu, HI)
- Austin Switch (Austin, TX and Lubbock, TX)
- Dayton Switch (Dayton, OH and Cayce, SC)
- Independence Switch (Independence, MO)
- Jacksonville Switch (Jacksonville, FL)
- Lemoore Switch (Lemoore, CA)
- New Jersey Switch (Vineland, New Jersey)
- Sioux Falls Switch (Sioux Falls, SD and Moorhead, MN)
- Syracuse Switch (Syracuse, NY and Holyoke, MA)

The TSP program ensures that the Sprint Relay call centers are placed on a priority basis to re-establish telephone service for Relay Missouri users. Sprint is proud to voluntarily comply with the FCC's TSP program. See Attachment N, the general press release regarding the TSP program.

#### A.5. STS Called Numbers

*§64.604 (a)(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.*

Sprint's Relay customer database is available to Speech-to-Speech (STS) users. The database can be used to store a list of names, frequently dialed telephone numbers, and customer notes. The database automatically appears on the CA's terminal screen each time a user dials into one of the Sprint relay numbers. The customer database helps to facilitate call set up and conversing preferences for the STS user. Customer profile information contained in the Sprint Customer Database will be transferred to any new provider at the end of the contract term. Currently, STS is waived from Internet Relay, Video Relay and *CapTel* services.

### IV. Technical Standards

#### B.1. ASCII and Baudot

*§64.604 (b) Technical standards—(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.*

Each Sprint CA position is capable of receiving and transmitting in voice, Baudot including TurboCode™ and E-TurboCode™ as well as ASCII codes. Upon a call being received at the CA position, TTY signals are automatically identified as either Baudot or ASCII; if ASCII, the baud rate is detected. Intelligent modems allow the CA to handle either voice or data lines from the same CA work station.

This automatic identification of call types for incoming calls provides a quick and efficient technique for varied customer input and reduces the average CA work time to a minimum.



ASCII rates up to and including 19,200 bps are supported by the Sprint platform. The domestic TTY baud rate of 45.5 and the international rate of 50 baud are also supported.

Sprint IP currently provides services via ASCII connection. Currently, ASCII and Baudot requirements are waived for *CapTel* services. See Attachment K about *CapTel* waivers.

## B.2. Speed of Answer

***§64.604 (b)(2) Speed of answer. (i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.***

Sprint Relay has developed the capability to effectively manage a human resource pool that provides unsurpassed quality. Sprint has gained valuable experience in sizing its TRS Operations to accommodate contract requirements. Historical call detail is gathered by 15-minute periods throughout the years of providing TRS service. This historical information is combined with state-specific information to establish anticipated call patterns that accurately predict the personnel needs necessary to efficiently process the relay calls.

Sprint meets the requirement of answering 85% of all calls within 10 seconds on a daily basis by a live CA. (Abandoned calls are included in this 85/10 Service Level calculation.) Sprint will ensure that no more than 30 seconds elapses between the receipt of the dialing information and the dialing of the requested number.

Sprint samples the average answer time a minimum of every 30 minutes for each 24-hour period. Sprint's Traffic Management Control Center and our Enhanced Services Operations Control Center (ESOCC) are staffed with professionals who understand call processes, call volumes, distribution patterns, contract requirements and call routing, thus ensuring exemplary service.

The Sprint Centers that serve Missouri are provided with sufficient facilities to provide a Grade of Service (GOS) of P.01 or better for calls entering the Missouri call center switch equipment. Inbound calls that may be blocked within the Public Switched Telephone Network (PSTN) will receive a voice recording stating that all circuits are busy and to try the call again within a few minutes.

Performance of inbound traffic on each toll-free number where it enters the Sprint network is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the state. In addition, the dedicated trunk facilities that route the call from the terminating network switch to the ACD (Automatic Call Distributor) at the serving relay center are monitored daily for compliance with blockage limitations. The data is monitored for both short and long-term trends to ensure the most cost-effective use of resources.

Sprint also meets requirements for Sprint IP/IP Wireless, VRS and *CapTel* calls. Sprint *CapTel* ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold. Abandoned calls are included in the speed-of-answer calculation. Sprint *CapTel* system is designed to a P.01 standard or greater measured on a daily basis.

***§64.604 (b)(2)(ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being***

*placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.*

Sprint has met the requirement of answering 85% of all calls within 10 seconds on a daily basis by a live CA. (Abandoned calls are included in this 85/10 Service Level calculation.) Sprint samples the average answer time a minimum of every 30 minutes for each 24-hour period. Sprint currently samples every 15 minutes.

Sprint Relay is committed to providing relay users with functionally equivalent telecommunication services as that enjoyed by standard telephone users. To this end, Sprint will continue to answer 85% of all relay calls within 10 seconds. There will be no more than 30 seconds of elapsed time between receipt of dialing information and the dialing of the requested number. Sprint begins measuring speed-of-answer at the time the call hits the Relay switch. Calls are answered by a live CA and are not to be placed in a queue or on hold after reaching the Relay switch.

#### **Sprint's Service Level calculation for all TRS calls, excluding *CapTel***

- Number of calls handled < 10 seconds / (total calls handled + total calls abandoned)
- The SVL is the number of calls handled in 10 seconds or less divided by the total number of calls offered.
- Number of calls offered = total number of calls handled + total number of calls abandoned,
- $SVL = \text{Number of calls handled in } < 10 \text{ seconds} / \text{Number of calls offered}.$

**Sprint's Service Level Calculation for *CapTel*:** For *CapTel* users, the number of calls that arrive at the *CapTel* call center will be the number of Calls Offered.

- The number of calls that are answered by a CA is the number of Calls Answered.
- The time for each call between the time the call arrives at the *CapTel* call center and the time answered by a CA until it is abandoned is the Speed of Answer.
- Any time spent in the Voice-in telephone menu is time controlled by the user to enter in the phone number of the *CapTel* user they are calling. This time is subtracted out from the Speed of Answer time.
- The total number of calls with the Speed of Answer as 10 seconds or less is the number of Qualifying Calls.
- $\text{Qualifying Calls} / \text{Calls Offered} = \text{Service Level (x percent of calls answered within 10 seconds)}.$

**Sprint's Weighted Service Level for TRS:** Sprint uses a "weighting" process to combine the results of several Call Centers into a single result:

The "weighted" service level (SVL) is a calculation that multiplies the number of "State" calls handled in each center by the center's daily SVL (the outcome is a factor called 'SVL points'). The resultant 'SVL points' for each center that handled that 'State' traffic is then summed. The sum of the 'SVL points' is then divided by the total number of 'State' calls to get a daily 'weighted' SVL.

Sprint will answer 85% of all calls within 10 seconds on a daily basis and will not place a caller in queue or on hold. The ten seconds begins at the time the call is delivered to the Sprint Relay Center and Sprint will ensure that adequate network facilities are available to avoid the possibility of a busy response due to loop trunk congestion.

**Sprint's Weighted Service Level for *CapTel*:** While *CapTel* operates two *CapTel* call centers, all calls are directed through one Automatic Call Distributor switch. All calls are answered in the order received and the service level is measured, unweighted, by this switch.

***§64.604 (b)(2)(ii)(A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.***

Sprint considers the call delivered when the Relay Center's equipment accepts the call from the LEC, and the public switched network actually delivers the call to the TRS Center.

Sprint furnishes the necessary telecommunications equipment, facilities and system software for complete TRS operation. Sprint is a certified Interexchange Carrier (IXC) in all 50 states. Sprint's transmission circuits meet, and in most cases, exceed the ANSI T1.506-1990 Network Performance – Transmission Specifications for Switched Exchange Access Network standards.

***§64.604 (b)(2)(ii)(B) Abandoned calls shall be included in the speed-of-answer calculation.***

Please see (b)(2)(ii) above.

***§64.604 (b)(2)(ii)(C) A TRS provider's compliance with this rule shall be measured on a daily basis.***

Please see (b)(2)(ii) above.

***§64.604 (b)(2)(ii)(D) The system shall be designed to a P.01 standard.***

Sufficient transmission facilities have been provided to service all traffic levels, including busy hour peaks. Sprint utilizes trunks that are sized to provide a busy hour Grade of Service (GOS) of P.01 or a minimum of 99 out of 100 calls will have unrestricted and immediate access to the call center facilities during the busiest time of day.

Inbound calls that may be blocked within the Public Switched Telephone Network (PSTN) will receive a voice recording stating that all circuits are busy and to try the call again within a few minutes. In addition, the dedicated trunk facilities that route the call from the terminating network switch to the *AUTOMATIC CALL DISTRIBUTOR* (Automatic Call Distributor) at the serving relay center are monitored daily for compliance with blockage limitations.

Sprint ensures no greater than 1% blockage on a daily basis. Sprint offers state Relay customers the advantages of a superior digital fiber network unsurpassed in the industry. Through use of leading switch technology and SONET network survivability techniques, Sprint's network ensures a very low level of call interruption or blockage.

The Sprint network switch architecture is non-hierarchical, that is, all switches are directly interconnected. Sprint switches are processor-controlled using advanced digital technology and are virtually non-blocking. A call across the Sprint network passes over Inter Machine Trunks (IMT)

which are engineered at P.01 GOS at the busy hour to allow for maximum network call completion. The P.01 GOS requirements ensure that at least 99% of calls to the Relay Center will reach a CA. The Local Exchange Carrier (LEC) network typically utilizes a P.01 grade of service also, and similar blockage rates should apply on their facilities.

***§64.604 (b)(2)(ii)(E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.***

Performance of inbound traffic on each toll-free number where it enters the Sprint network or relay center facility is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the state.

***§64.604 (b)(2)(iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.***

Sprint Relay complies with this requirement. See Attachment L.

### **B.3. Equal Access to Interexchange Carriers**

***§64.604 (b)(3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.***

Sprint provides Missouri callers with the ability to have their intrastate, interstate and international calls carried by any interexchange carrier who has agreed to participate in the Missouri Carrier of Choice (COC) program. When a caller indicates their COC preference, the CA will verify that the requested carrier is a COC participant, if they are, the call will be routed accordingly. Callers will be able to use any billing method made available by the requested carrier including collect, third party, prepaid and calling cards.

The current participating members of Sprint Carrier of Choice program are:

AT&T Communications	McLeod USA
Bell South Long Distance	Qwest Communications
Bestline	SBC Communications Long Distance
Birch Telecom	Sprint
Broadwing Communications	Telecomm*USA (MCIWorldCom)
Broadwing Telecommunications	Touch America Services, Inc.
Cox Communications	U.S. Link
Excel Telecommunications, Inc.	VarTec dba Clear Choice Communications
Global Crossings Telecommunications	VarTec Telecom, Inc.
MCIWorldCom	Verizon Long Distance

If a Missouri caller does not indicate a COC preference to the CA either on-line or in their customer database (or if their preferred carrier is not a COC participant), the call will be carried over the Sprint network. As with calls carried by Sprint, most COC participants limit billing methods based on the type of line from which the call originates. When the requested carrier is not a COC participant, Sprint has established a procedure where the carrier will be notified, verbally and in writing, of its obligation to provide access to TRS users and encourage their participation.

See Attachment E, the Carrier of Choice letter sent to carriers when a customer has a preferred interexchange carrier that does not participate in the Sprint COC program.

#### B.4. TRS Facilities

***§64.604 (b)(4) TRS facilities. (i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.***

Sprint TRS and Sprint Relay Customer Service are both available 24 hours a day, every day of the year. Sprint utilizes both UPS and backup power generators to ensure that the relay centers have uninterrupted power even in the event of a power outage. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. The backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. The generators can stay in service for longer periods of time as long as fuel is available. Sprint IP/IP Wireless, VRS and *CapTel*/Relay Services are also available 24 hours a day, seven days a week.

***§64.604 (b)(4)(ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.***

#### **Sprint Relay Network Support Plan:**

##### Service Reliability:

Sprint's service is provided through an all-fiber sophisticated management control network that supports backbone networks with digital switching architecture. These elements are combined to provide a highly reliable, proven, and redundant network. Survivability is a mandatory objective of the Sprint network design. The Sprint network minimizes the adverse effect of service interruptions due to equipment failures or cable cuts, network overload conditions, or regional catastrophes.

A 100 percent fiber-optic network provides critical advantages over the other carriers. These advantages include:

- *Quality:* Since voice and data are transmitted utilizing fiber optic technology, the problems of outdated analog and even modern microwave transmission simply do not apply. Noise, electrical interference, weather-impacting conditions, and fading are virtually eliminated.
- *Economy:* The overall quality, architecture, and advanced technology of digital fiber optics make transmission so dependable that it costs us less to maintain, thereby passing the savings on to our customers.

- *Expandability:* As demand for network capacity grows, the capacity of the existing single-mode fiber can grow. Due to the architecture and design of fiber optics, the capacity of the network can be upgraded to increase 2,000-fold.

- *Survivability:*

Network survivability is the ability of the network to cope with random disruptions of facilities and/or demand overloads. Sprint has established an objective to provide 100 percent capability to reroute backbone traffic during any single cable cut. This is a significant benefit to Missouri, and a competitive differentiation of the Sprint network.

Network switched services are provided via 49 Northern Telecom DMS-250/300 switches at 29 locations nationwide. Three DMS-300s located at New York, NY; Fort Worth, TX; and Stockton, CA, serve as international gateways. The remaining 46 switches provide switching functions for Sprint's domestic switched services.

Interconnection of the 49 switches is provided in a non-hierarchical manner. This means that inter-machine trunk (IMT) groups connect each switch with all other switches within the network. Each of these IMT groups is split and routed through the Sprint fiber network over SONET route paths for protection and survivability. As an extra precaution to preclude any call blockage, Dynamically Controlled Routing (DCR) provides an additional layer of tandem routing options when a direct IMT is temporarily busy.

Reliability is ensured through a corporate commitment to maintain or surpass our system objectives. Beginning with the network design, reliability and efficiency are built into the system. Sprint continues to improve the network's reliability through the addition of new technologies.

The effectiveness of this highly reliable and survivable network is attributed to the redundant transmission and switching hardware configurations, SONET ring topology, and sophisticated network management and control Centers. These factors combine to assure outstanding network performance and reliability for Missouri.

### Network Criteria

- *System Capacity:* The Sprint network was built with the capacity to support every interLATA and intraLATA call available in the US. With the continuing development of network fiber transmission equipment to support higher speeds and larger bandwidth, the capacity of the Sprint network to support increasing customer requirements and technologies is assured well into the future.

- *Service Restoration:*

Sprint provides for the restoration of service in the event of equipment malfunctions, isolated network overloads, major network disruptions and national/civil emergency situations. In the event of service disruption due to Sprint's equipment, service typically is restored within four hours after notification. Sprint does everything possible to prevent a total outage at its switch sites or at any of its POPs through the use of advanced site designs. All processors, memory, and switch networks within our switches are fully redundant. All switch sites are protected by uninterruptible power supplies and halon systems planned in conjunction with local fire departments. Most of our new sites are earth sheltered to increase survivability. A multi-pronged program is used to minimize outages:

Do everything possible to minimize the impact of a "single point of failure," including:

- Diversification of all facilities' demands between switch sites. All switch sites are connected to the long haul network over at least two separate Sprint fiber routes; many have three paths.
- Deployment of multiple switches at large switching Centers. This prevents a single switch outage from disabling the site.
- Have systems in place allowing for the rapid redeployment of network resources in case of a catastrophic outage. Fiber cuts, which can affect thousands of calls at several locations, are sometimes unavoidable. Response to these outages is maximized through the following procedures.
- Utilization of established plans to respond effectively to these outages.
- The capability to rapidly deploy network transmission facilities when needed.
- Immediate execution of alternate routing in the digital switches and cross-connect systems to assist in the handling of temporary network disruptions and forced overloads.
- The entire spectrum of survivability needs, expectations, and requirements can be met by the proper engineering of customer and Sprint switches and facilities.

#### Fiber Backbone Loop Topology and Reconfiguration

Fiber optic cable routes are designed to include redundant capacity to insure survivable fiber optic systems. Sprint's SONET network, using four-fiber bi-directional line switched ring capability, allows automatic switching to alternate paths to provide for traffic rerouting in the event of a route failure. The SONET fiber optic backbone topology is currently designed with more than 100 overlapping rings to ensure sufficient alternate paths for total network survivability. See Attachment F for Sprint's Route Outage Prevention Programs. Also, please refer to the Disaster Recovery Plan provided in Attachment G for a complete explanation of Sprint's back-up plan.

#### **B.5. Technology**

***§64.604 (b)(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.***

Sprint is in full compliance with 47 CFR §64.1600 et seq. of the FCC's Rules for providing SS7 capability.

In order to achieve functional equivalence, Sprint will continue to provide Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long-distance calls. Sprint receives calling party identifying information including blocking information, from all Relay users. Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound Relay caller as well as other SS7 call information elements such as:

- Calling Party Number
- Charge Number
- Originating Line Information

- Sprint passes through the calling party information (rather than 711 or the number of the Relay Center)

Sprint meets all minimum technological standards regarding Video Relay Service. Sprint VRS is available through [www.sprintVRS.com](http://www.sprintVRS.com) and [sprintrelay.tv](http://sprintrelay.tv) (for Videophone users).

On 31 July 2006, Sprint launched MySprintVRS number. This MySprintVRS number feature empowers deaf and hard of hearing Video Relay Service (VRS) users with a simple means of receiving incoming calls with MySprintVRS number, a hearing user simply dials one toll free number and quickly reaches an Interpreter who connects them to the deaf or hard of hearing VRS user without supplying any additional information.

The value of a dedicated personal number is generally taken for granted. Without a dedicated personal number, things such as entering a contact number in a department email directory or printing one simple number on a business card are much more complicated. Today telephone numbers are also used as account identifiers or for ordering items. Sprint, unlike most other VRS providers, makes this possible.

For VRS users who have not registered for MySprintVRS, hearing callers may dial a general access toll-free number and provide the VI with the VRS user's IP Address, or their Sprint VRS Mail extension number.

On 28 October 2006, Sprint also introduced a revolutionary means of wirelessly accessing Sprint VRS mail. Sprint, as a telecommunications provider, is uniquely positioned to make retrieval of VRS mail from wireless devices possible from devices with Windows Media Player capability. Sprint VRS Mail for wireless devices is extremely popular and empowers VRS users to access and playback VRS message directly from their handset.

In addition to providing SprintIP Relay Services, Sprint is also proud to offer the deaf and hard-of-hearing community with cutting-edge technology using Sprint IP using AIM®. Sprint IP is capable of blending the easy-to-use capabilities of Sprint IP Relay with the power of wireless devices and equipment that run AIM®. In addition to the ability to place a relay call over the internet, the wireless user can access Sprint IP on a wireless device with AIM. This service allows users to access relay from the park, a restaurant, or even the airport – anywhere a wireless device can access the internet and AIM. Sprint also provides *CapTel* services, recognized as an enhanced VCO service. See Attachment M, Sprint Relay Fact Sheet, for more information on technology provided through Sprint Relay.

## B.6. Caller ID

***§64.604 (b)(6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.***

Sprint Relay offers a network-based Caller ID for all outbound calls which traverse over Sprint's integrated Services Digital Network (ISDN) and SS7 with FGD network. This feature supports Caller ID for all local and long distance calls. In all cases in which it is received, Sprint forwards the calling party's ANI (Automatic Number ID) to the terminating LEC for long-distance calls utilizing Sprint's Feature Group D trunks (FGD). As with standard telecommunications, the terminating LEC may or may not choose to use this ANI information as Caller ID information and pass this on to the terminating number. When passed through, the relay call recipient will be able



to see the caller's phone number on their caller ID display (the caller ID option feature must first be purchased through their LEC). When not passed through, as with standard telecommunications, the call recipient will receive a message such as "OUT OF AREA" or "CALLER UNKNOWN."

## **V. Functional Standards**

### **C.1. Consumer Complaint Logs**

*§64.604 (c)(1)(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. (ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.*

Sprint provides copies of each TRS Customer Contact form, which includes the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved and explanation of the resolution and any other pertinent information to Missouri. Further, Sprint maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to each of the Sprint States.

By June 15<sup>th</sup> of each calendar year, Sprint submits a copy of 12-month complaint log report for the period of June 1- May 31 to the State relay administrators.

### **C.2. Contact Persons**

*§64.604 (c)(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following: (i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions; (ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and (iii) The physical address to which correspondence should be sent.*

Missouri Public Service Commission  
Attention: Mike Scheperle  
200 Madison Street  
P.O. Box 360  
Jefferson City, Missouri 65102-0360  
Phone (V) (573) 751-5054 or dial 7-1-1 then (573) 751-5054  
TTY: (573) 522-9061  
Fax: (573) 751-1847  
E-mail: [mike.scheperle@psc.mo.gov](mailto:mike.scheperle@psc.mo.gov)

### C.3. Public Access to Information

*§64.604 (c)(3) Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.*

Missouri rural and urban carriers do provide information in their phone books regarding access to relay services. A sample of some of those carriers' phone book cover pages and pages containing TRS access information is included in Attachment O.

Missouri's relay contract obligates Sprint, its relay vendor, to perform community outreach efforts. Sprint's contract includes a \$200,000 per year line item for these outreach efforts. Sprint's outreach efforts include holding and attending workshops, seminars and conventions and providing public service announcements. Sprint also contacts businesses and community groups to educate them about relay phone calls.

See Attachment R for 2004-2005 and 2005-2006 annual reports prepared by Sprint for Missouri detailing TRS activity and outreach, and Attachment Q to see a sample of copies newsletters prepared by Sprint for Relay Missouri. See Attachment S for other outreach materials.

A 12-member Advisory Committee, the Relay Missouri Advisory Committee (RMAC), established to monitor the ongoing provisions of the relay service to its users, was expanded to 14 members in 2001. RMAC currently consists of seven representatives from the deaf, late-deafened, hard-of-hearing, hearing and speech-impaired communities; an audiologist or speech pathologist; one representative each from the Missouri Commission for the Deaf, the TRS vendor, and the Missouri Office of the Public Counsel, the Missouri Telecommunications Industry Association; and two representatives from the MoPSC.

The RMAC assists in evaluating promotional efforts, responds to complaints and/or needs of the deaf, hard-of-hearing and speech-impaired communities; acts as a liaison between the contractor and the deaf, hard-of-hearing, and speech-impaired communities, and responds to and evaluates the need for relay service enhancements that may improve the efficiency of the service. The Advisory Committee may then make recommendations to the MoPSC for its consideration and ultimate resolution.

### C.4. Rates

*§64.604 (c)(4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination*

Relay Missouri users are charged no more for interexchange services than for those charges paid by standard "voice" telephone users. Relay Missouri users, who select Sprint as their

interstate carrier, will be rated and invoiced by Sprint. The caller will only be billed for conversation time. Those users, who select a preferred interstate carrier via the Relay Missouri COC list, will be rated and invoiced by the selected interstate carrier.

By FCC jurisdiction, Sprint has two separate Message Telephone Service rates – one for interstate and one for intrastate. The table below exhibits the discounted rates off Sprint's Message Telephone System (MTS) rates.

	Intrastate	Interstate
<b>Day</b> (7 AM – 6:59 PM)	50%	50%
<b>Evening</b> (7 PM – 10:59 PM)	50%	50%
<b>Night/weekend</b> (11 PM – 6:59 AM; all day Saturday & Sunday)	50%	50%

#### C.5. Jurisdictional Separation of Costs

*§64.604 (c)(5) Jurisdictional separation of costs—(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended (ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.*

All Missouri relay intrastate and interstate minutes are reported separately and distinctly to the state on the Sprint invoice. The interstate and international minutes are reimbursed by the TRS Interstate Fund. The local and intrastate minutes are reimbursed by the State. On individual customer invoices, Sprint deducts minutes that the National Exchange Carrier Association (NECA) would reimburse. These deductible minutes are associated with these call types: Interstate, International, Interstate Directory Assistance, Toll Free and 900. In accordance with FCC rules, States receive only a 51% deduction for Toll Free and 900 minutes since this is what NECA would reimburse. For NECA reimbursement, Sprint uses a cumulative report of eligible customers to calculate its monthly reimbursement request. An invoice and supporting documents are sent monthly to NECA for reimbursement.

Relay Missouri, created in 1990, is authorized by § 209.251, et seq., Revised Statutes of Missouri. Section 209.255 authorizes and requires the MoPSC to order a monthly surcharge against local telephone lines to be paid by local telephone services subscribers to support the Relay Missouri. In June 2007, the MoPSC, by its Order Adopting Relay Missouri Fund Review And

Establishing Fund Surcharge (Order) in Case No. TO-2007-0306 reviewed the Relay Missouri program and continued the surcharge at \$0.13 per local telephone line. Attachment T includes §§ 209.251 through 201.259, RSMo., and the MoPSC's Order.

## C.6. Complaints

***§64.604 (c)(6)(i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously. (ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.***

Sprint has a comprehensive Customer Complaint Tracking program. A supervisor or Operations Administrator is available 24 hours a day to accept complaints, document and forward documentation to the proper source for resolution. Supervisors provide immediate feedback to both the customer and the CA.

Sprint will provide copies of each TRS Customer Contact form, including the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved and explanation of the resolution and any other pertinent information to Missouri. Further, Sprint maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to each of the Sprint States.

The complaint resolution procedure outlines the steps to ensure complaints are resolved within 180 days of filing. If the complaint concerns a specific CA, an Operations Supervisor follows up and resolves the complaint. The role of the supervisor is to:

- Accept all types of complaints, issues and comments.
- Handle all service type complaints.
- Resolve complaints with Communication Assistants.
- Follow up with customers if requested by the customers.

If the complaint concerns a specific technical issue, a trouble ticket is filed and the ticket number is documented on the customer contact form. The ticket will be investigated and resolved by an on-site technician. The state-assigned Relay Program Manager is responsible for tracking all technical complaints and following-up with customers on resolutions.

If a miscellaneous complaint is filed with customer service, a copy is faxed to the appropriate Relay Program Manager for resolution and follow-up with the customer. Missouri customers also have the option of calling our 24-hour Customer Service department (1-800-676-3777) or the Relay Missouri Program Manager to file complaints or commendations.

Sprint has the capability to transfer the caller on-line to the Customer Service department. A Customer Service representative will always answer the calls live. The assigned Relay Program Manager is responsible for tracking all commendations and complaints and sending copies of Customer Contacts to the State Relay Administrator by the invoice due date of the following month. To assist customers in identifying contact information for complaints, the toll-free Customer Service number and other contact information is included on all brochures and outreach materials, including relay web sites.

Sprint Relay submits all Interstate Relay (Sprint IP, IP Wireless) and Video Relay Service complaints directly to the FCC from June 1-May 31st of each year by the July 1st deadline. See Attachment U for the complaint logs and cover letters submitted by the MoPSC for 2003, 2004, 2005, 2006 and 2007.

#### C.7. Treatment of TRS Customer Info

*§64.604 (c)(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.*

The Sprint Customer Preference Database includes such items such as types of call, billing information, speed dialing, slow typing, carrier of choice, as well as emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes are included in the customer profile. At the end of the ensuing contract(s) Sprint will transfer all Missouri database records to the next incoming relay provider, at least 60 days prior to the last day of service, in a usable format.

#### *§64.605 State Certification:*

*(a)(1) Certified state program. Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned "TRS State Certification Application." All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by the state program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.*

Relay Missouri provides TRS through its contract provider, Sprint. Relay Missouri does not provide Video Relay Services or Internet Relay services for the state of Missouri. Although there are references to Sprint Relay IP and Sprint Relay VRS services, Relay Missouri does not contract to provide these services, nor does Relay Missouri oversee these services for the state of Missouri.

FCC Rules and Regulations specify that where a State TRS program exceeds the mandatory minimum standards, the state must establish that its program in no way conflicts with federal laws. The MoPSC has determined that the State TRS Program, as it currently exists, in no way conflicts with any known federal law. Further, to ensure compliance with federal standards and regulations Missouri's Relay contract standards are those established by the FCC. Furthermore, paragraph 3.14.1 of Missouri's TRS contract incorporates those federal standards whether or not those standards have been explicitly stated:

### 3.14 FCC Requirements

All current mandated standards and regulations and any future standards mandated by the FCC relating to TRS codified by the FCC, whether or not said standards are specifically mentioned, named, or referenced to this RFP shall be incorporated by reference. The state may negotiate with the contractor in the event of FCC mandated changes that would necessitate a change in the price or services required for the provision of Relay as paid out of the state Relay Fund.

See Attachment V, Section 3 of the Relay Missouri Contract with Sprint.

**WHEREFORE**, the Missouri Public Service Commission requests renewal of its certification of the program known as Relay Missouri for the five-year period beginning July 26, 2008 and continuing through July 26, 2013.

Respectfully submitted,

/s/ Shelley Syler Brueggemann

Shelley Syler Brueggemann

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Dated November 19, 2007

Attachment A:

SECOND REGULAR SESSION  
[TRULY AGREED TO AND FINALLY PASSED]  
HOUSE COMMITTEE SUBSTITUTE FOR  
SENATE COMMITTEE SUBSTITUTE FOR  
**SENATE BILL NO. 721**  
90TH GENERAL ASSEMBLY  
2000

2918L.06T

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**AN ACT**

To repeal sections 209.251, 209.253, 209.255, 209.258, 209.259 and 301.020, RSMo Supp. 1999 and section 302.171 as enacted by house bill no. 783, first regular session, 89th General Assembly and section 302.171 as enacted by senate bill no. 19, first regular session, 90th General Assembly, relating to telecommunications for persons with disabilities, and to enact in lieu thereof ten new sections relating to the same subject, with an effective date for certain sections.

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*Be it enacted by the General Assembly of the State of Missouri, as follows:*

Section A. Sections 209.251, 209.253, 209.255, 209.258 and 209.259, RSMo Supp. 1999, are repealed and seven new sections enacted in lieu thereof, to be known as sections 191.862, 191.865, 209.251, 209.253, 209.255, 209.258 and 209.259, to read as follows:

**191.862. 1. The Missouri assistive technology advisory council, established in section 191.853, shall establish an assistive technology loan program. The loan program shall be funded from the assistive technology loan revolving fund established pursuant to section 191.865. The fund shall receive any appropriation and grant moneys received pursuant to subsection 2 of this section to provide loans for the purchase of assistive technology devices and services, as defined in section 191.850.**

**2. The loan program shall provide loans for the first fiscal year following appropriation. Any matching grant moneys received by the state pursuant to the Title III of the federal Assistive Technology Act of 1998 or through any other applicable sources shall be used to fund the loan program. The state treasurer shall provide the assistive technology advisory council with information on the amount of moneys in the assistive technology loan revolving fund at the beginning of each fiscal year. The council shall quarterly expend such moneys in four equal shares to ensure that the loan program will provide loans throughout the entire fiscal year. Any repayments or interest earned during a fiscal year shall not be used for loans in the current fiscal year, but shall be carried over for use in the next fiscal year.**

**3. The interest rates for loans shall be lower than comparable commercial lending rates and shall be established by the council based on the borrower's ability to pay. Loans may be made with no interest. Loan repayment periods shall not exceed ten years.**

**4. The council shall:**

**(1) Promulgate rules relating to borrower eligibility, interest rates, repayment terms and other matters necessary to implement the purpose of this section,**

including limits on the number and amounts of loans to assure the continued solvency of the fund; and

(2) File annual reports with the governor and general assembly which shall include an accounting of the loans and repayments to the fund during the preceding fiscal year.

5. The council may enter into contracts as necessary to carry out the purposes of this section, including but not limited to contracts with disability organizations and lending institutions.

6. By no later than January 1, 2001, the council shall submit a report to the general assembly regarding any rules proposed or promulgated for the implementation of this program.

7. No rule or portion of a rule promulgated pursuant to the authority of this section shall become effective unless it has been promulgated pursuant to chapter 536, RSMo.

**191.865. 1.** In order to allow Missourians with disabilities to take advantage of Title III of the federal Assistive Technology Act of 1998, there is hereby created in the state treasury the "Assistive Technology Loan Revolving Fund" which shall be administered by the Missouri assistive technology advisory council and the state treasurer.

2. Moneys in the fund shall, upon appropriation, be used to establish and maintain the assistive technology loan program established in section 191.862.

3. The fund shall consist of any moneys appropriated to the fund, repayments of principal and interest by qualified borrowers, and interest earned on the moneys in the fund.

4. The fund may accept federal, state and other public funds, public or private grants, contributions and loans to the fund with the approval of the Missouri assistive technology advisory council.

5. Notwithstanding the provisions of section 33.080, RSMo, to the contrary, moneys in the fund shall not revert to the general revenue fund at the end of the biennium.

209.251. As used in sections 209.251 to 209.259, the following terms mean:

(1) **"Adaptive telecommunications equipment"**, equipment that translates, enhances or otherwise transforms the receiving or sending of telecommunications into a form accessible to individuals with disabilities. The term adaptive telecommunications equipment includes adaptive telephone equipment and other types of adaptive devices such as computer input and output adaptations necessary for telecommunications access;

(2) **"Basic [telephone] telecommunications access line"**, a [telephone] telecommunications line which provides service from the telephone company central office to the customer's premises which enables the customer to originate and terminate long distance and local [calling] telecommunications;

[2] (3) **"Commission"**, the public service commission;

(4) **"Consumer support and outreach"**, services that include, but are not limited to, assisting individuals with disabilities or their families or caregivers in the selection of the most appropriate adaptive telecommunications equipment to meet their needs, providing basic training and technical assistance in the installation and use of adaptive telecommunications equipment, and development and dissemination of information to increase awareness and use of adaptive telecommunications equipment;



(5) **"Department", the department of labor and industrial relations;**

(6) "Eligible subscriber", any individual who has been certified as deaf, hearing-impaired, speech-impaired or as having another disability that causes the inability to use [traditional telephone] **telecommunications** equipment and services by a licensed physician, audiologist, speech pathologist or a qualified [state] agency;

(7) **"Missouri assistive technology advisory council" or "council", the body which directs the Missouri assistive technology program pursuant to sections 191.850 to 191.863, RSMo;**

(8) **"Program administrator", the entity or entities designated to design the statewide telecommunications equipment distribution program, develop and implement the program policies and procedures, assure delivery of consumer support and outreach and account for and pay all program expenses;**

[(4)] (9) "Surcharge", an additional charge which is to be paid by local exchange telephone company subscribers pursuant to the rate recovery mechanism established pursuant to sections 209.255, 209.257 and 209.259 in order to implement the [program] **programs** described in sections 209.251 to 209.259;

(10) **"Telecommunications", the transmission of any form of information including, but not limited to, voice, graphics, text, dynamic content, and data structures of all types whether they are in electronic, visual, auditory, optical or any other form;**

[(5)] (11) "Telecommunications device for the deaf" or "TDD", a telecommunications device capable of allowing deaf, hearing-impaired or speech-impaired individuals to transmit messages over basic telephone access lines by sending and receiving typed messages.

209.253. 1. The commission shall [initiate an investigation to determine the most beneficial and cost-effective method to implement the provision of] **provide** a statewide dual-party system, using third-party intervention to connect deaf, hearing-impaired and speech-impaired persons and offices of organizations representing the deaf, hearing-impaired and speech-impaired with telecommunication devices for the deaf (TDDs) and the telephone system, making available reasonable access to telephone service to eligible subscribers. [In conducting this investigation the commission shall solicit the advice, counsel, and assistance of statewide nonprofit organizations of the deaf, the office of the public counsel and representatives of telecommunications companies. The commission shall complete this investigation within six months of July 10, 1990.]

2. The [commission] **Missouri assistive technology advisory council** shall [initiate an investigation to determine the most beneficial and cost-effective method to implement the provision of] **provide** a statewide telecommunications equipment distribution program making available reasonable access to [telephone] **basic telecommunications** service for eligible subscribers who are unable to use traditional [telephone] **telecommunications** equipment due to disability. [In conducting this investigation the commission shall solicit the advice, counsel and assistance of statewide nonprofit organizations for individuals with disabilities, the office of the public counsel and representatives of telecommunications companies. The commission shall complete such investigation within six months of August 28, 1996.]

3. Within sixty days of the completion of the investigations provided in subsections 1 and 2 of this section, the division of purchasing, on behalf of the commission, shall issue a request for competitive bids to provide a statewide dual-party relay service and equipment distribution program which meets the specifications and criteria determined by such investigations. The request for competitive bids shall contain the date, as determined by the division of purchasing, by which all bids shall be submitted and the division of purchasing shall not accept or consider any bids received after that date.

4. Within sixty days of the date provided in subsection 3 of this section requiring bids to be submitted, the division of purchasing shall open all bids and shall thereafter award a contract to the best bidder and shall in all instances reserve the right to reject any and all bids. A bond satisfactory to the division shall be given by the party to whom the contract is awarded, to secure the faithful performance of such contract.]

**3. The program administrator of the statewide telecommunications equipment distribution program shall:**

- (1) Provide consumer support and outreach;**
- (2) Develop administrative procedures to assure an appropriate match between an individual with a disability and adaptive telecommunications equipment;**
- (3) Provide a full range of adaptive telecommunications equipment to meet the needs of individuals with all types of disabilities;**
- (4) Procure and distribute adaptive telecommunications equipment in the most cost-effective manner possible; and**
- (5) Expend no less than ten percent of total expenditures for consumer support and outreach and no more than twenty percent of total expenditures for program administration in any fiscal year.**

**4. Missouri public or nonpublic organizations shall be used to deliver consumer support and outreach and administrative services in all contracts and subcontracts for a statewide telecommunications equipment distribution program.**

**5. The Missouri assistive technology advisory council shall be the program administrator for the statewide telecommunications equipment distribution program.**

**6. The Missouri assistive technology advisory council may promulgate rules necessary to implement and administer the telecommunications equipment distribution program, but no rule or portion of a rule promulgated pursuant to the authority of this section shall become effective unless it has been promulgated pursuant to chapter 536, RSMo.**

**7. The Missouri assistive technology advisory council may enter into contracts as necessary to carry out the telecommunications equipment distribution program, including but not limited to contracts with disability organizations.**

[5.] **8. Nothing in sections 209.251 to 209.259 shall be construed to require the state to purchase, install or maintain equipment on an eligible subscriber's premises which will enable the eligible subscriber to participate in the dual-party relay system.**

**9. Nothing in sections 209.251 to 209.259 shall be construed to require the state to provide adaptive telecommunications equipment at no cost to all eligible subscribers. The Missouri assistive technology advisory council shall adopt procedures to limit eligibility based on financial means, existing access to adaptive telecommunications equipment, prior usage of the equipment distribution program, and other factors deemed appropriate by the program administrator. The scope of the program shall be limited to reasonable access to basic telecommunications as defined by the program administrator, subject to appropriations.**

209.255. 1. The commission shall establish a rate recovery mechanism to recover the costs of implementing and maintaining the [program] **programs** provided for in section 209.253, which shall be applied to each basic telephone access line. Any surcharge established by such rate recovery mechanism shall not be imposed upon more than one hundred basic telephone access lines per subscriber per location. Any surcharge established by such rate recovery mechanism shall not be imposed on any telephone line used to provide pay telephone service. The surcharge may appear on the bill of each local exchange telephone subscriber identified separately as a deaf relay service and equipment distribution program fund surcharge. The commission shall not vary the amount of the surcharge between telephone companies nor between the class or grade of customers of any telephone company. The surcharge provided for in this section shall be exempt from the taxes provided for in chapter 144, RSMo, and the surcharge

shall not be construed as gross receipts or revenue of the company collecting such for the purpose of local taxation.

2. Each basic telephone access line subscriber is liable for the payment of any surcharge provided for in subsection 1 of this section. The local exchange telephone company shall not be liable for any uncollected surcharge, nor shall it have any obligation to initiate any action to enforce the collection of the surcharge.

209.258. 1. All remaining deaf relay service and equipment distribution program fund surcharge money collected by local exchange telephone companies pursuant to section 209.257 shall be paid to the director of revenue in a manner prescribed by the public service commission. The director of revenue shall remit such payments to the state treasurer.

2. The state treasurer shall credit such payments to a special fund, which is hereby created, to be known as the "Deaf Relay Service and Equipment Distribution Program Fund" which fund shall be devoted solely to the payment of expenditures actually incurred in operation of the statewide dual-party relay service and equipment distribution program authorized by section 209.253, including expenses associated with the administration of the dual-party relay service and equipment distribution program or incurred by members of any advisory committee appointed by the commission **or Missouri assistive technology advisory council** to help [it administer the dual-party relay service and] **in the administration of the statewide telecommunications** equipment distribution program authorized by section 209.253.

3. Any unexpended balance in the fund at the end of the fiscal year shall be exempt from the provisions of section 33.080, RSMo, relating to the transfer of unexpended balances to the general revenue fund, but shall be applicable by appropriation of the general assembly to the payment of expenditures for the dual-party relay service and equipment distribution program in the succeeding fiscal year.

4. [Any unexpended balance in the deaf relay service fund on August 28, 1996, shall be transferred to the deaf relay service and equipment distribution program fund which is created in subsection 2 of this section.] **The commission shall annually request, through a separate budget line item, appropriations from the deaf relay service and equipment distribution program fund to deliver the dual-party relay service. The Missouri assistive technology advisory council shall annually request, through a separate budget line item of its departmental budget, appropriations from the deaf relay service and equipment distribution program fund to deliver the telecommunications equipment distribution program.**

**5. The current surcharge rate shall not increase for a period of two years after August 28, 2000, subject to change in federal requirements for deaf relay services.**

209.259. 1. From the date of implementing the deaf relay service and equipment distribution fund surcharge, the commission shall review such surcharge no less frequently than every two years but no more than annually and shall order changes in the amount of the surcharge as necessary to assure available funds for the provision of the [program] **programs** established in section 209.253.

**2. The Missouri assistive technology advisory council shall annually provide the department with information on actual expenditures for the equipment distribution program along with projections for future need to assist in surcharge review. On August 28, 2000, the department shall make its initial recommendation to the commission regarding the amount of the surcharge established in section 209.255 necessary for funding of the equipment distribution program. Thereafter, the department may annually make a recommendation to the commission regarding the amount of the surcharge for that program. The commission shall, based on the department's recommendation, issue an order revising the surcharge established in section 209.255 as necessary to fund the equipment distribution program. The department's recommendation shall be based on the estimated number of access lines and anticipated budget for the coming fiscal year. The amount of the surcharge recommended by the department shall be sufficient to recover the annual costs of implementing and maintaining the equipment distribution program.**

**3.** Concurrent with the review of the surcharge, the commission shall review the percentage deducted and retained by the local exchange telephone company provided in section 209.257 and if necessary shall order adjustments to the percentage to assure a just and reasonable compensation to the local exchange telephone company. Where the review of the surcharge determines that excess funds are available, the commission may order the suspension of the deaf relay service and equipment distribution program fund surcharge for a period which the commission deems appropriate.

Section B. Section 301.020, RSMo Supp. 1999, and section 302.171, as both versions appear in RSMo Supp. 1999, are repealed and three new sections enacted in lieu thereof, to be known as sections 192.936, 301.020 and 302.171, to read as follows:

**192.936. 1. There is hereby created in the state treasury the "Blindness Education, Screening and Treatment Program Fund". The fund shall consist of moneys donated pursuant to subsection 7 of section 301.020, RSMo, and subsection 3 of section 302.171, RSMo. Unexpended balances in the fund at the end of any fiscal year shall not be transferred to the general revenue fund or any other fund, the provisions of section 33.080, RSMo, to the contrary notwithstanding.**

**2. Subject to the availability of funds in the blindness education, screening and treatment program fund, the department shall develop a blindness education, screening and treatment program to provide blindness prevention education and to provide screening and treatment for persons who do not have adequate coverage for such services under a health benefit plan.**

**3. The program shall provide for:**

- (1) Public education about blindness and other eye conditions;**
- (2) Screenings and eye examinations to identify conditions that may cause blindness; and**
- (3) Treatment procedures necessary to prevent blindness.**

**4. The department may contract for program development with any department approved nonprofit organization dealing with regional and community blindness education, eye donor and vision treatment services.**

**5. The department may adopt rules to prescribe eligibility requirements for the program.**

**6. No rule or portion of a rule promulgated pursuant to the authority of this section shall become effective unless it has been promulgated pursuant to the provisions of chapter 536, RSMo.**

301.020. 1. Every owner of a motor vehicle or trailer, which shall be operated or driven upon the highways of this state, except as herein otherwise expressly provided, shall annually file, by mail or otherwise, in the office of the director of revenue, an application for registration on a blank to be furnished by the director of revenue for that purpose containing:

- (1) A brief description of the motor vehicle or trailer to be registered, including the name of the manufacturer, the vehicle identification number, the amount of motive power of the motor vehicle, stated in figures of horsepower and whether the motor vehicle is to be registered as a motor vehicle primarily for business use as defined in section 301.010;**
- (2) The name, the applicant's identification number and address of the owner of such motor vehicle or trailer;**
- (3) The gross weight of the vehicle and the desired load in pounds if the vehicle is a commercial motor vehicle or trailer.**

2. If the vehicle is a motor vehicle primarily for business use as defined in section 301.010 and if such vehicle is five years of age or less, the director of revenue shall retain the odometer information provided in the vehicle inspection report, and provide for prompt access to such information, together with the vehicle identification number for the motor vehicle to which such information pertains, for a period of five years after the receipt of such information. This section shall not apply unless:

- (1) The application for the vehicle's certificate of ownership was submitted after July 1, 1989; and**

(2) The certificate was issued pursuant to a manufacturer's statement of origin.

3. If the vehicle is any motor vehicle other than a motor vehicle primarily for business use, a recreational motor vehicle, motorcycle, motortricycle, bus or any commercial motor vehicle licensed for over twelve thousand pounds and if such motor vehicle is five years of age or less, the director of revenue shall retain the odometer information provided in the vehicle inspection report, and provide for prompt access to such information, together with the vehicle identification number for the motor vehicle to which such information pertains, for a period of five years after the receipt of such information. This subsection shall not apply unless:

(1) The application for the vehicle's certificate of ownership was submitted after July 1, 1990; and

(2) The certificate was issued pursuant to a manufacturer's statement of origin.

4. If the vehicle qualifies as a reconstructed motor vehicle, motor change vehicle, specially constructed motor vehicle, non-USA-std motor vehicle, as defined in section 301.010, the owner or lienholder shall surrender the certificate of ownership. The owner shall make an application for a new certificate of ownership, pay the required title fee, and obtain the vehicle examination certificate required pursuant to section 301.190. Notarized bills of sale along with a copy of the front and back of the certificate of ownership for all major component parts installed on the vehicle and invoices for all essential parts which are not defined as major component parts shall accompany the application for a new certificate of ownership. If the vehicle is a specially constructed motor vehicle, as defined in section 301.010, two pictures of the vehicle shall be submitted with the application. If the vehicle is a kit vehicle, the applicant shall submit the invoice and the manufacturer's statement of origin on the kit. If the vehicle requires the issuance of a special number by the director of revenue or a replacement vehicle identification number, the applicant shall submit the required application and application fee. All applications required under this subsection shall be submitted with any applicable taxes which may be due on the purchase of the vehicle or parts. The director of revenue shall appropriately designate "Reconstructed Motor Vehicle", "Motor Change Vehicle", "Non-USA-Std Motor Vehicle", or "Specially Constructed Motor Vehicle" on the current and all subsequent issues of the certificate of ownership of such vehicle.

5. Every insurance company which pays a claim for repair of a motor vehicle which as the result of such repairs becomes a reconstructed motor vehicle as defined in section 301.010 shall in writing notify the claimant, if he is the owner of the vehicle, and the lienholder if a lien is in effect, that he is required to surrender the certificate of ownership, and the documents and fees required pursuant to subsection 3 of this section, to the director of revenue. The insurance company shall within thirty days of the payment of such claims report to the director of revenue the name and address of such claimant, the year, make, model, vehicle identification number, and license plate number of the vehicle, and the date of loss and payment.

6. Anyone who fails to comply with the requirements of this section shall be guilty of a class B misdemeanor.

**7. An applicant for registration may make a donation of one dollar to promote a blindness education, screening and treatment program. The director of revenue shall collect the donations and deposit all such donations in the state treasury to the credit of the blindness education, screening and treatment program fund established in section 192.936, RSMo. Moneys in the blindness education, screening and treatment program fund shall be used solely for the purposes established in section 192.936, RSMo, except that the department of revenue shall retain no more than one percent for its administrative costs. The donation prescribed in this subsection is voluntary and may be refused by the applicant for registration at the time of issuance or renewal. The director shall inquire of each applicant at the time the applicant presents the completed application to the director whether the applicant is interested in making the one dollar donation prescribed in this subsection.**

302.171. 1. Application for a license shall be made upon an approved form furnished by the director. Every application shall state the full name, Social Security number, age, height, weight, color of eyes, sex, residence, mailing address of the applicant, and the classification for which the applicant has been licensed, and, if so, when and by what state, and whether or not such license has ever been suspended, revoked, or disqualified, and, if revoked, suspended or disqualified, the date and reason for such suspension, revocation or disqualification and whether the applicant is making a one dollar donation to

promote an organ donation program as prescribed in subsection 2 of this section. The application shall also contain such information as the director may require to enable the director to determine the applicant's qualification for driving a motor vehicle; and shall state whether or not the applicant has been convicted in this or any other state for violating the laws of this or any other state or any ordinance of any municipality, relating to driving without a license, careless driving, or driving while intoxicated, or failing to stop after an accident and disclosing the applicant's identity, or driving a motor vehicle without the owner's consent. The application shall contain a certification by the applicant as to the truth of the facts stated therein. Every person who applies for a license to operate a motor vehicle who is less than twenty-one years of age shall be provided with educational materials relating to the hazards of driving while intoxicated, including information on penalties imposed by law for violation of the intoxication-related offenses of the state. Beginning January 1, 2001, if the applicant is less than eighteen years of age, the applicant must comply with all requirements for the issuance of an intermediate driver's license pursuant to section 302.178.

2. An applicant for a license may make a donation of one dollar to promote an organ donor program. The director of revenue shall collect the donations and deposit all such donations in the state treasury to the credit of the organ donor program fund established in sections 194.297 to 194.304, RSMo. Moneys in the organ donor program fund shall be used solely for the purposes established in sections 194.297 to 194.304, RSMo, except that the department of revenue shall retain no more than one percent for its administrative costs. The donation prescribed in this subsection is voluntary and may be refused by the applicant for the license at the time of issuance or renewal of the license. The director shall make available an informational booklet or other informational sources on the importance of organ donations to applicants for licensure as designed by the organ donation advisory committee established in sections 194.297 to 194.304, RSMo. The director shall inquire of each applicant at the time the licensee presents the completed application to the director whether the applicant is interested in making the one dollar donation prescribed in this subsection and whether the applicant is interested in making an organ donation and shall also specifically inform the licensee of the ability to make an organ donation by completing the form on the reverse of the license that the applicant will receive in the manner prescribed by subsection 6 of section 194.240, RSMo. The director shall notify the department of health of information obtained from applicants who indicate to the director that they are interested in making organ donations, and the department of health shall enter the complete name, address, date of birth, race, gender and a unique personal identifier in the registry established in subsection 1 of section 194.304, RSMo.

**3. An applicant for a license may make a donation of one dollar to promote a blindness education, screening and treatment program. The director of revenue shall collect the donations and deposit all such donations in the state treasury to the credit of the blindness education, screening and treatment program fund established in section 192.936, RSMo. Moneys in the blindness education, screening and treatment program fund shall be used solely for the purposes established in section 192.936, RSMo, except that the department of revenue shall retain no more than one percent for its administrative costs. The donation prescribed in this subsection is voluntary and may be refused by the applicant for the license at the time of issuance or renewal of the license. The director shall inquire of each applicant at the time the licensee presents the completed application to the director whether the applicant is interested in making the one dollar donation prescribed in this subsection.**

[302.171. 1. Application for a license shall be made upon an approved form furnished by the director. Every application shall state the full name, Social Security number, age, height, weight, color of eyes, color of hair, sex, residence, mailing address of the applicant, and the classification for which the applicant has been licensed, and, if so, when and by what state, and whether or not such license has ever been suspended, revoked, or disqualified, and, if revoked, suspended or disqualified, the date and reason for such suspension, revocation or disqualification and whether the applicant is making a one dollar donation to promote an organ donation program as prescribed in subsection 2 of this section. The application shall also contain such information as the director may require to enable the director to determine the applicant's qualification for driving a motor vehicle; and shall state whether or not the applicant has been convicted in this or any other state for violating the laws of this or any other state or any ordinance of any municipality,

relating to careless driving, or driving while intoxicated, or failing to stop after an accident and disclosing the applicant's identity, or driving a motor vehicle without the owner's consent. The application shall contain a certification by the applicant as to the truth of the facts stated therein. Every person who applies for a license to operate a motor vehicle who is less than twenty-one years of age shall be provided with educational materials relating to the hazards of driving while intoxicated, including information on penalties imposed by law for violation of the intoxication-related offenses of the state.

2. An applicant for a license may make a donation of one dollar to promote an organ donor program. The director of revenue shall collect the donations and deposit all such donations in the state treasury to the credit of the organ donor program fund established in sections 194.297 to 194.304, RSMo. Moneys in the organ donor program fund shall be used solely for the purposes established in sections 194.297 to 194.304, RSMo, except that the department of revenue shall retain no more than one percent for its administrative costs. The donation prescribed in this subsection is voluntary and may be refused by the applicant for the license at the time of issuance or renewal of the license. The director shall make available an informational booklet or other informational sources on the importance of organ donations to applicants for licensure as designed by the organ donation advisory committee established in sections 194.297 to 194.304, RSMo. The director shall inquire of each applicant at the time the licensee presents the completed application to the director whether the applicant is interested in making the one dollar donation prescribed in this subsection and whether the applicant is interested in making an organ donation and shall also specifically inform the licensee of the ability to make an organ donation by completing the form on the reverse of the license that the applicant will receive in the manner prescribed by subsection 6 of section 194.240, RSMo. The director shall notify the department of health of information obtained from applicants who indicate to the director that they are interested in making organ donations, and the department of health shall enter the complete name, address, date of birth, race, gender and a unique personal identifier in the registry established in subsection 1 of section 194.304, RSMo.]

Section C. The provisions of section B of this act shall become effective January 1, 2001.

## **President of the Senate**

## **Speaker of the House of Representatives**

## **Governor**

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## Attachment B: Sprint TRS, STS, *CapTel*, and VRS Training Outlines

### Sprint TRS Training Outline

Module	Module Description
<b>Module 1</b>	<b>Orientation</b> <ul style="list-style-type: none"> <li>▪ Objectives</li> <li>▪ Welcome &amp; History</li> <li>▪ Future of Sprint</li> <li>▪ What is Relay?</li> <li>▪ CA Training</li> <li>▪ Call Flow Chart</li> </ul>
<b>Module 2</b>	<b>Phone Image</b> <ul style="list-style-type: none"> <li>▪ Objectives</li> <li>▪ Introduction</li> <li>▪ Communicating Information</li> <li>▪ Using Conversational Tone</li> <li>▪ Managing Dissatisfied Customers</li> </ul>
<b>Module 3A</b>	<b>Overview of System and Equipment</b> <ul style="list-style-type: none"> <li>▪ Objectives</li> <li>▪ Logging In</li> <li>▪ Logging Out</li> <li>▪ Screen Display</li> <li>▪ Checking for Understanding</li> <li>▪ Headsets</li> <li>▪ Modem</li> <li>▪ Error Correction</li> <li>▪ Keyboard</li> <li>▪ Last Typed Macro Feature</li> <li>▪ English Macros</li> <li>▪ Spanish Macros</li> <li>▪ Telephony Terms</li> </ul>
<b>Module 3B</b>	<b>Interactive Terminals</b> <ul style="list-style-type: none"> <li>▪ Knowing Your TTY</li> <li>▪ Closing a Conversation</li> <li>▪ Typing Background Noises</li> </ul>
<b>Module 3C</b>	<b>Overview of System and Equipment (FRS Only)</b> <ul style="list-style-type: none"> <li>▪ Malfunctions</li> <li>▪ Relay Procedures</li> <li>▪ Confidentiality</li> <li>▪ Statistics</li> <li>▪ Handling Obscene Calls</li> <li>▪ Requesting a Supervisor</li> <li>▪ Reporting</li> <li>▪ Macros</li> </ul>
<b>Module 4A</b>	<b>Call Processing Procedures</b> <ul style="list-style-type: none"> <li>▪ Objectives</li> <li>▪ Your Role as CA</li> <li>▪ Call Processing for All States</li> </ul>



Module	Module Description
<b>Module 4B</b>	<b>Destinations of Traffic</b> <ul style="list-style-type: none"> <li>▪ Destinations not Allowed</li> <li>▪ IntraLata Competition</li> <li>▪ State Differences</li> </ul>
<b>Module 4C</b>	<b>Answering Machines and Audiotext</b> <ul style="list-style-type: none"> <li>▪ Record Feature</li> <li>▪ Voice Answering Machine</li> <li>▪ Voice to TTY Answering Machine</li> <li>▪ Information Line</li> <li>▪ Audiotext</li> <li>▪ Voice Mail</li> <li>▪ Pagers/Beepers (TTY-Voice)</li> <li>▪ Pagers/Beepers (Voice - TTY)</li> <li>▪ Variations</li> <li>▪ Answering Machine Retrieval</li> </ul>
<b>Module 4D</b>	<b>Voice Originated Calls</b> <ul style="list-style-type: none"> <li>▪ Local Call Description</li> <li>▪ Toll Free and Paid</li> <li>▪ Paid over Sprint Network</li> <li>▪ Paid over Alternate Carrier</li> <li>▪ Variations</li> </ul>
<b>Module 4E</b>	<b>Long Distance Calling</b> <ul style="list-style-type: none"> <li>▪ FONcard</li> <li>▪ LEC Card</li> <li>▪ Optional Cards</li> <li>▪ Pre-Paid Cards</li> <li>▪ Collect</li> <li>▪ Third Party</li> <li>▪ Immediate Credit</li> </ul>
<b>Module 4F</b>	<b>VCO and HCO</b> <ul style="list-style-type: none"> <li>▪ Voice Carry Over (VCO)</li> <li>▪ Inbound VCO Branding</li> <li>▪ Busy Line</li> <li>▪ No Answer</li> <li>▪ Two-Line VCO</li> <li>▪ Hearing Carry Over (HCO)</li> <li>▪ Non-Branded HCO</li> <li>▪ Branded HCO</li> </ul>

Module	Module Description
<b>Module 4G</b>	<b>Alternate Call Types</b> <ul style="list-style-type: none"> <li>▪ VCO to VCO</li> <li>▪ VCO to TTY</li> <li>▪ TTY to VCO</li> <li>▪ HCO to HCO</li> <li>▪ HCO to TTY</li> <li>▪ TTY to HCO</li> </ul>
<b>Module 4H</b>	<b>Customer Database</b> <ul style="list-style-type: none"> <li>▪ Customer Database Feature</li> <li>▪ Customer Notes Window</li> <li>▪ UCR Main Menu</li> <li>▪ Name Submenu</li> <li>▪ COC Submenu</li> <li>▪ InterLata COC</li> <li>▪ IntraLata COC</li> <li>▪ Billing Method Window</li> <li>▪ Billing Options</li> <li>▪ Numbers Submenu</li> <li>▪ Emergency Numbers</li> <li>▪ Frequently Dialed Numbers (FD)</li> <li>▪ Blocked Numbers</li> <li>▪ Customer Notes</li> </ul>
<b>Module 4H</b>	<b>Customer Database</b> <ul style="list-style-type: none"> <li>▪ Preferences</li> <li>▪ Answer Type</li> <li>▪ Language Type</li> <li>▪ Outdial Restrictions</li> <li>▪ Macros</li> <li>▪ Last Number Redial</li> </ul>

Module	Module Description
<b>Module 4I</b>	<b>Variations</b> <ul style="list-style-type: none"> <li>▪ Busy Signals</li> <li>▪ Poor Connection</li> <li>▪ No Answer</li> <li>▪ Request for Information</li> <li>▪ Speech Impaired</li> <li>▪ Pacing Voice Customer</li> <li>▪ Profanity towards CA</li> <li>▪ Request for M or F CA</li> <li>▪ CA Knows Customer</li> <li>▪ Suicide</li> <li>▪ Abuse</li> <li>▪ Illegal Calls</li> <li>▪ Sensitive Topics</li> <li>▪ Redialing</li> <li>▪ Switchboards</li> <li>▪ Young Children</li> <li>▪ Inbound ASCII</li> <li>▪ Repeating Information</li> <li>▪ Request for Relay Number</li> <li>▪ Restricted Calls</li> <li>▪ ASCII on Outbound Line</li> <li>▪ Regional 800</li> <li>▪ Two Calling From Numbers</li> <li>▪ LEC Service Office</li> <li>▪ Double Letters</li> <li>▪ Call Waiting</li> <li>▪ Conference Calls</li> <li>▪ Three-Way Calling</li> <li>▪ Changing CAs</li> <li>▪ 800 Number Referral</li> <li>▪ Hard-of-Hearing Customer</li> <li>▪ Call Backs for TTYs</li> <li>▪ Multiple Calls</li> </ul>
<b>Module 4I</b>	<b>Variations</b> <ul style="list-style-type: none"> <li>▪ Call Modification</li> <li>▪ Holding</li> <li>▪ Alternate Language</li> <li>▪ Typing in Parenthesis</li> <li>▪ Product Information</li> <li>▪ Spanish Calls</li> <li>▪ Voice Customer Hangs Up</li> <li>▪ Variable Time Stamp</li> <li>▪ TTY Customer Hangs Up</li> <li>▪ Conversation being Recorded</li> <li>▪ Prompting Voice for "GA"</li> <li>▪ Non-Standard TTY Capability</li> <li>▪ Internet Characters</li> <li>▪ TTY does not type "GA"</li> <li>▪ Cellular Long Distance Calls</li> <li>▪ Party Line Calls</li> </ul>

Module	Module Description
<b>Module 5</b>	<b>Emergency Call Processing</b> <ul style="list-style-type: none"> <li>Emergency Calls</li> <li>Non-Emergency Calls</li> <li>Emergency Incident Form</li> </ul>
<b>Module 6A</b>	<b>Performance and Procedures</b> <ul style="list-style-type: none"> <li>Performance Measurement Plan</li> <li>Quality Customer Service</li> <li>Commitment</li> <li>Personal Effectiveness</li> <li>Assessment Survey and Replay</li> <li>Emergency Procedures</li> <li>Emergency Assistance Form</li> <li>Checking for Understanding</li> </ul>
<b>Module 6B</b>	<b>Healthy Relay</b> <ul style="list-style-type: none"> <li>Introduction</li> <li>Analogy</li> <li>Stretching Exercises</li> <li>CA Reinforcement</li> <li>Ergonomic Review</li> <li>Setting up Workstation</li> <li>GUAM - Get up and move</li> </ul>
<b>Module 6B</b>	<b>Healthy Relay</b> <ul style="list-style-type: none"> <li>Ergonomic Relief</li> <li>Slowing the Customer</li> <li>Overtime Relaxation</li> </ul>
<b>Module 7A</b>	<b>Responding Positively</b> <ul style="list-style-type: none"> <li>Stress Management</li> <li>Thoughts and Feelings</li> <li>Relaxing Emotionally</li> <li>Thinking Powerfully</li> <li>Exercise</li> <li>Nutrition</li> <li>Relaxation/Meditation</li> <li>Energy Resource Assessment</li> <li>Suggested Reading</li> <li>Leader's Notes</li> </ul>
<b>Module 7B</b>	<b>Healthy Detachment</b> <ul style="list-style-type: none"> <li>Interactive Communication</li> <li>TDD Communication</li> <li>Potential Stressors</li> <li>Detaching</li> </ul>
<b>Module 8</b>	<b>Assessing Performance</b> <ul style="list-style-type: none"> <li>Assessment Process</li> <li>Coaching</li> <li>Feedback</li> <li>Pass/Fail Guidelines</li> <li>Role Plays</li> </ul>

Module	Module Description
<b>Module 9</b>	<b>Supervisor as Trainer and Coach</b> <ul style="list-style-type: none"> <li>▪ Introduction</li> <li>▪ Objectives</li> <li>▪ Being a Coach/Trainer</li> <li>▪ An Adult Learner</li> <li>▪ Giving Effective Instruction</li> <li>▪ Feedback</li> </ul>
<b>Module 10</b>	<b>A Healthy Approach to Relay</b> <ul style="list-style-type: none"> <li>▪ Learning Continuum</li> <li>▪ Adult Education</li> <li>▪ Dale's Cone of Experience</li> <li>▪ Elements of Lesson Design</li> <li>▪ Preparation for Training</li> <li>▪ Warm Ups</li> <li>▪ Voice Inflection</li> <li>▪ Handling Interruptions</li> <li>▪ Prep for Final</li> <li>▪ Hearing Thru (TDD - Voice)</li> <li>▪ Hearing Thru (Voice - TDD)</li> <li>▪ Voice Thru (TDD - Voice)</li> <li>▪ Voice Thru (Voice - TDD)</li> <li>▪ Audiotext</li> <li>▪ Information Lines</li> <li>▪ Business Answering Machines</li> <li>▪ Residential Answering Machines</li> <li>▪ Beepers</li> <li>▪ Spanish Answering Machine</li> <li>▪ TTY Answering Machine</li> </ul>

## Speech-to-Speech Training Outline

<b>Module 1</b>	<b>Orientation</b>	
	<ul style="list-style-type: none"> <li>▪ Objectives</li> <li>▪ Welcome &amp; Introductions</li> <li>▪ Description</li> <li>▪ History</li> </ul>	What is Speech to Speech Differences from Relay Agent Training
<b>Module 2</b>	<b>Speech to Speech Customers</b>	
	<ul style="list-style-type: none"> <li>▪ Objectives</li> <li>▪ Introduction</li> <li>▪ Phone Image</li> <li>▪ Characteristics of Speech to Speech Customers</li> <li>▪ Breaking the Stereotypes</li> </ul>	Varying Speech Patterns Voice Synthesizers Types of Calls Transparency & Confidentiality Phrases
<b>Module 3</b>	<b>Attributes of STS CAs</b>	
	<ul style="list-style-type: none"> <li>▪ Objectives</li> <li>▪ Patience</li> <li>▪ Concentration</li> <li>▪ Listening Skills</li> </ul>	Caller Control Sensitivity and Understanding
<b>Module 4A</b>	<b>Call Processing Procedures</b>	
	<ul style="list-style-type: none"> <li>▪ Objectives</li> <li>▪ Your Role as CA</li> <li>▪ Billing</li> <li>▪ Directory Assistance</li> <li>▪ Changing CAs</li> </ul>	
<b>Module 4B</b>	<b>Answering Machines and Audiotext</b>	
	<ul style="list-style-type: none"> <li>▪ Answering Machines</li> <li>▪ SA to SD Answering Machine</li> <li>▪ Busy/Disconnects</li> <li>▪ Audiotext Message</li> <li>▪ Pagers/Beepers</li> </ul>	
<b>Module 4C</b>	<b>Emergency Call Processing</b>	
	<ul style="list-style-type: none"> <li>▪ Emergency Services</li> <li>▪ EM Numbers</li> <li>▪ Emergency Incident Form</li> </ul>	
<b>Module 4D</b>	<b>Variations</b>	
	<ul style="list-style-type: none"> <li>▪ Outbound to Relay</li> <li>▪ Personal Conversations</li> <li>▪ Operator Calls</li> <li>▪ Talking on Hold</li> <li>▪ Keeping the Customer Informed</li> <li>▪ Differentiating STS and Relay</li> <li>▪ Outdialing to STS</li> </ul>	Using GA Spelling Announcement 900 Calls Request to Hold SD to SD through STS Non STS Calls

## Sprint *CapTel*/Training Outline

### 1.0 Training Summary Outline

#### 1.1 Introduction/Tour

Introductions: Lead trainer, training assistant, Call Center director, and other administrative personnel that may be involved in the first day of training. Prospective CAs are given a tour of the building and the facilities. Each individual is given a security passkey and shown how to use it. The CTI building is a secured facility and the passkey is needed to enter the parking lot after normal business hours, enter the building and gain access to the Call Center floor by stairway or elevator.

#### 1.2 Human Resources Overview

The Human Resource coordinator meets with each group to go over required employment paperwork for the State of Wisconsin, Call Center policies, non-disclosure agreement, confidentiality requirements, expected standards that must be met to pass out of training, and current scheduling needs.

#### 1.3 Videos

Several videos are shown to better demonstrate the job of a CA and how the technology works and how it provides improved communication for our clients. After each video, questions are answered or clarified as needed.

#### 1.4 Mini Demonstration *CapTel*/Phone

A brief explanation of the *CapTel*/phone and the captioning system is given including commonly used terminology when referring to each party involved in a call. Each trainee is then able to place a short call to experience using the *CapTel*/phone. This helps individuals to better understand what we are asking them to provide our clients and what the client experiences.

#### 1.5 Introduction - Developing a Personal Voice Profile

Developing a personal voice profile is the most important step to successfully process *CapTel*/calls. CAs are given specific instruction as to how to speak, how to sit, and how to utilize the computer and headset to gain optimal accuracy.

#### 1.6 Introduction - Training Program

The *CapTel* training program allows individuals to listen to various pre-recorded scripts and "re-voice" what they hear directly into the recognition program. Individuals are coached to focus on developing the proper re-voicing technique. This simulates the conversation or voice of the hearing person and having to repeat those words to the computer accurately. Through the progression of various training scripts CAs work to improve their speed of speech while maintaining accurate pronunciation of words based on each script.

### **1.7 Introduction - Call Handling Tools**

Macros are utilized to aid in the speed and accuracy of calls. CAs listen to pre-recorded scripts that consist mainly of macro type words and learn to utilize the macros accordingly.

### **1.8 Introduction - Call Handling Skills –Pacing a Conversation**

CAs are introduced to further call handling skills that allow them to pace various calls in order to provide accurate captions.

### **1.9 Introduction - Call Handling Skills – Inserting Words**

*CapTel* trains its CAs to insert particular words that the Voice Recognition is not able to caption successfully or in a consistent manner. These words include such things as people's names and regional cities and towns.

### **1.10 Introduction – How to Handle Various Recordings**

CAs are introduced to various types of calls and how to handle each. The importance of verbatim transcription, confidentiality, accuracy and speed are reviewed. CAs view a demonstration by the training assistant, and then each CA is assigned scripts relating to answering machines and automated recordings.

### **1.11 Introduction & Demo of *CapTel* Conversation**

Each trainee observes each end of the "telephone call", (CA, *CapTel* user, hearing person). Each CA assists in making "live" calls to other trainees. This encourages each CA to observe and experience what our clients experience on every call. It also allows the CA who is captioning an opportunity to practice their learned techniques on more realistic, true to life calls.

## **2.0 Introduction to Call Simulation**

Live call simulation allows CAs to gain exposure to real incoming calls landing on the production floor, however they do not interfere with the quality of captions going to the *CapTel* user. New CAs are paired with experienced CAs on the production floor to observe and listen to live calls.

### **2.1 Call Simulation-Timings**

CAs are placed into a rotation of call simulation and receive their first official timing for speed and accuracy baseline timings provide a progress report for each CA and develop a list of improvement areas. This measures the quality and accuracy of re-voicing.

### **2.2 Review of Baseline Timings**

Training Scripts are assigned to the group. One at a time, each CA meets with the trainer to review their baseline timings. Feedback and review of standards and expectation are given.

### **2.3 Introduction to Correction Tool**

The correction tool is introduced to provide CAs with another opportunity to provide the highest quality captions.



## **2.4 Review Training Elements**

CAs meet as a group with the trainer to review the various elements that enable them to provide the quality of captions we expect from each CA.

## **3.0 Monthly Timing Policy**

CTI's monthly timing policy is reviewed with all CAs. The importance of successfully passing these timings is emphasized.

### **3.1 Call Simulation-Timings**

CAs are placed into a rotation of call simulation and receive an official timing. This second timing is a base-line timing in which re-voicing accuracy and call handling skills along with the ability to correct errors are evaluated. Each CA is unaware of when the timing will occur.

## **4.0 Production Floor Orientation**

Current supervisors meet with the group of CAs to go over specific Call Floor procedures, expectations, break adherence, time clock, lockers, emergency plans, and point of contact individuals for questions and assistance.

CAs continue to progress onto the production floor and practice in the training room as needed. CAs are timed each day and progress is reviewed until a CA meets the expected standards or it is determined the individual is not suited for the position. Action is taken as necessary.

## Video Relay Service Training Outline and Qualifications

All Sprint VRS interpreters are qualified and will adhere to the Registry of Interpreters for the Deaf (RID) Code of Ethics. The VRS interpreter qualifications are listed below:

- Certified by the NAD at levels III, IV, or V or certified by RID as IC/TC, CI, CSC, LSC or MSC or demonstrated State equivalent. (Note: In rare instances, VIs may process Sprint VRS calls prior to certification based on qualifications and interpreting skills).
- Possess English language skills at a college level.
- Observe strict confidentiality guidelines using RID's Code of Ethics.
- Function in a totally transparent mode.
- Possess strong receptive and voicing skills.
- Possess sensitivity to the needs of the Deaf, Hard of Hearing and hearing parties
- Have a wide range of experience working in the deaf Community utilizing ASL, PSE and Signed English Community utilizing ASL, PSE and Signed English communication modes in social, economic, and educational settings.
- Possess interpreting experience for persons who have minimal language skills.
- Possess computer literacy, including familiarity with current Windows operation system, and be able to operate computer and video equipment.
- Exhibit superior customer service skills.
- Possess the skill to conduct video interpretation sessions with a wide range of individuals.
- Have a good command of English grammar and composition.
- Possess clear and articulate voice communications.
- Be familiar with speech and disability cultures, languages, and etiquette.
- Possess the ability to work under pressure.
- Be capable of working in a multi-tasked environment.
- Have the skill to conduct telephone conversations with a wide range of individuals.
- Be a citizen of the U.S. or an alien who has been lawfully admitted for permanent residence as evidenced by the INS Permanent Resident Card (INS Form I-551).
- Successfully completed, as a minimum, training to include deaf culture, American Sign Language, sensitivity to the capabilities and needs of people with speech impairments, the VI's role in the relay process, and training in interpersonal skills to handle difficult or stressful conversations.
- Beginning college level skills in English grammar and diction.

## Attachment C: TRS Pledge of Confidentiality

### RELAY CENTER CODE OF ETHICAL BEHAVIOR

AS PART OF THE RELAY SERVICES ORGANIZATION, ALL EMPLOYEES, CONTRACTORS AND VISITORS ARE BOUND TO THE LAWS OF THE STATE AND THE FOLLOWING GUIDELINES:

1. ALL TELECOMMUNICATIONS RELAY SERVICE CALL RELATED INFORMATION IS TO BE STRICTLY CONFIDENTIAL. The employee, contractor or visitor shall not reveal any information acquired during or observing a relay call. Any call-related questions or problems are to be discussed with management.
2. NOTHING IS TO BE EDITED OR OMITTED FROM THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. The employee shall transmit exactly what is said in the way that it is intended in the language of the customer's choice.
3. NOTHING IS TO BE ADDED OR INTERJECTED INTO THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. The employee shall not advise, counsel, or interject personal opinions, even when asked to do so by the consumer.
4. TO ASSURE MAXIMUM USER CONTROL, THE EMPLOYEE WILL BE FLEXIBLE IN ADAPTING TO THE CONSUMER'S NEEDS.
5. EMPLOYEES WILL STRIVE TO FURTHER COMPETENCY IN SKILLS AND KNOWLEDGE THROUGH CONTINUED TRAINING, WORKSHOPS, AND READING OF CURRENT LITERATURE IN THE FIELD.

I have read and understand the Relay Center Code of Ethical Behavior. I agree to comply with this Code and any applicable State and Federal laws pertaining to Telecommunications Relay Services and understand that failure to do so will lead to company disciplinary action that may result in my termination and criminal prosecution.

\_\_\_\_\_  
EMPLOYEE/CONTRACTOR/VISITOR SIGNATURE      DATE

\_\_\_\_\_  
MANAGER/SUPERVISOR SIGNATURE      DATE

## CapTel/CA Pledge of Confidentiality

### Confidentiality Policy

- I will not disclose to any individual (outside of a member of the *CapTel* management staff) the identity of any caller or information I may learn about a caller (including names, phone numbers, locations, etc.) on any *CapTel* call.
- I will not act upon any information received while processing a *CapTel* call.
- I will not disclose to anyone the names, schedules, or personal information of any fellow worker at *CapTel* Inc.
- I will not share any information about *CapTel* calls with anyone except a member of the *CapTel* Inc. management staff in order to investigate complaints, technical issues, etc.
- I will continue to hold in confidence all information related to the work and calls I have performed while at *CapTel* Inc. after my employment ends.
- I will never reveal my Captionist ID number in conjunction with my name unless asked by a member of the *CapTel* Inc. management staff.
- I will not share with anyone any technical aspect of my position at *CapTel* Inc. unless asked by a member of the *CapTel* Inc. management staff.
  
- I will not talk about consumers or call content with any fellow Captionists.
- I will not listen to or get involved in calls taken by fellow Captionists.

I have read the above Confidentiality Policy and understand a breach of confidentiality will result in disciplinary action up to and including termination of employment at *CapTel* Inc. I recognize the serious and confidential nature of my position and therefore promise to abide by these guidelines.

---

Employee Name

Date

## Attachment D: E 911 Call Procedure

Sprint uses a system for incoming emergency calls that automatically and immediately transfers the relay user to the nearest Public Safety Answering Point (PSAP). Sprint considers an emergency call to be one in which the user of the relay service indicates they need the police, fire department, paramedics, or ambulance. The following steps will be taken to connect the caller to the correct PSAP:

- The CA, when told by a TTY/ASCII user (non-voice) that an emergency exists, will hit a "hot key".
- The CA's terminal sends a query to the E911 database containing the caller's geographic area ANI.
- The database responds with the telephone number of the PSAP that covers the geographic source of the call, and then, automatically dials the PSAP number, and automatically passes the caller's ANI to the E911 service center.

The CA remains on the line until emergency personnel arrive on the scene unless previously released by the caller. The CA also verbally passes the caller's ANI onto the E911 center operator. If the inbound relay caller disconnects prior to reaching E911, the CA will stay on the line to verbally provide the caller's ANI to the E911 center operator.

When a *CapTel* user dials 9-1-1, Sprint will route the call directly to the most appropriate PSAP. The 911 PSAP center will receive the caller's Automated Number Identification and Automated Locator Identification. If the call is disconnected, the 911 center will call the *CapTel* user back.

If a *CapTel* user had only one line connected to their *CapTel* phone, captions will not be engaged on the call. A prompt on the phone will instruct the *CapTel* user how to communicate with the 9-1-1 center to request Voice-Carry-Over communications to begin. The PSAP would be engaged in typing directly to the user, and the user would be able to speak to the 911 dispatcher.

## Attachment E: Sprint Carrier of Choice Letter of Invitation



(date)

(name)

(Company name)

(address)

(telephone)

(fax)

(e-mail address)

Re: (Customer's name and phone number – requested LEC for COC)

Thank you for your interest to complete (Company Name) Long Distance calls with Sprint Telecommunications Relay Service (TRS). As the default Toll carrier for processing relay calls in more than thirty-two states (32), Sprint currently transports the traffic of customers who have selected you as their Toll carrier. However, many of your customers would prefer to use (Company Name) LD for their toll calls. At present, Sprint TRS is unable to send the toll calls from the regional centers or state access tandem to your network. Hence, this letter is being written to make you aware of a potential service-impacting issue regarding TRS calls and measures your company can take to ensure your customers' toll calls are completed through TRS. The Americans with Disabilities Act of 1990 mandate TRS, and TRS standards are established and are monitored by the Federal Communications Commission (FCC). TRS is a service that links telephone conversations between standard (voice) telephone users and people who are deaf, hard of hearing, deaf-blind, or speech disabled using Text Telephone (TTY) equipment. The State Public Utilities Commission manages the day-to-day operations of TRS and has contracted with Sprint Corporation to provide relay service in their states.

Both, the Americans with Disabilities Act of 1990 and FCC's Order 00-56 on TRS mandate that all states provide TRS and that TRS users shall have equal access to their chosen interexchange carrier and to all other operator services, to the same extent that such access is provided to voice users. In order to provide this access to your customers, your company is encouraged to submit a letter of authorization to accept TRS calls from Sprint.

*Attachment A* lists the facility-based providers who currently participate at Sprint TRS Carrier of Choice program. If your company (or your facility based provider) is not currently listed, please review the following and determine the appropriate follow-up action needed to be taken:

### **Facility-based provider**

1. If you are a participating member at Sprint Carrier of Choice program, please disregard.

2. If you are not a participating member at Sprint Carrier of Choice program, you need to establish a network presence at the regional centers or state access tandem and accept calls from Sprint through the industry method of SS7 trunking and TRS billing codes of Info Digit Pair 60, 66, and 67 (see below).

**Non-facility based provider**

1. If your underlying toll carrier is a participating member at Sprint Carrier of Choice program, Sprint can implement the IXC brand name and pass the toll call information to the underlying carrier's CIC code. Please submit a letter of authorization that would advise Sprint to implement the carrier brand name and to send the toll call information to its underlying toll carrier.
2. If your underlying toll carrier is not a participating member at Sprint Carrier of Choice program, you will need to work with your underlying toll carrier to establish a network presence at the regional centers or state access tandem and accept calls from Sprint through the industry method of SS7 trunking and TRS billing codes of Info Digit Pair 60, 66, and 67 (see below).

Before you submit a letter of authorization to Sprint TRS, please consider the following four factors:

3. Your CIC codes or your underlying toll carrier CIC codes associated with 1+, 0+, and 0- and International dialing must be loaded into the regional (and/or state) access tandems.
4. You or your underlying toll carrier will need to support SS7 tandem interconnection.
5. You or your underlying toll carrier will need to ensure that your translation tables are updated in order to appropriately receive, rate, and bill Sprint calls per Bellcore industry standards. Sprint calls are designated as ANI II Digit Pair 60, 66, and 67.
6. If you utilize more than one underlying toll carrier to carry the toll traffic, select a single toll carrier that will accept Sprint traffic.

***Note:** For detailed information regarding access tandem interconnection and carrier of choice provisioning through Sprint, please refer to ATIS/NIIF-008, the "Telecommunications Relay service – Technical Needs" document.*

Attachment B lists Access Tandem Interconnection locations which Sprint TRS is connected with. The best way to provide access to your Toll network through relay service for your customers is to designate the 13 Sprint Regional TRS center/Access Tandem combinations as the points at which Sprint will hand off Toll relay service traffic to you. In this manner, any relay caller that wishes to use your services may be efficiently, and with minimal time delay, routed to your network. Should you not have a presence at one or more of the Sprint regional center/access tandem combinations, the traffic may be handed off at one of the regional center's access tandem. Attachment C is a sample letter of authorization. Once Sprint receives your written request to participate in the Sprint TRS Carrier of Choice program, Sprint will schedule translation updates in the next available release (usually 45 to 90 days). **Information obtained from the carriers will be used solely for the purpose of providing equal access for (Company Name) LD customers and shall be held proprietary.**

Sprint welcomes your company's participation in our TRS Carrier of Choice program at no cost to you if your company has network presence at any of our listed regional center/state access tandem locations. Your participation at the Sprint Carrier of Choice program will create a win-

win situation for our customers. Through Sprint, as the relay provider, customers will be able to enjoy uninterrupted service and your company will be able to generate additional revenue. Thank you for your prompt attention to this matter. If you have any questions concerning with the letter, please do not hesitate to call (Account Manager) at (phone number) or email at (e-mail address).

Sincerely Yours,

(your name)

CC: Michael Fingerhut, Federal Regulatory, Sprint  
Angela Officer, Program Manager, Sprint



## Attachment A

### Current participating members (facility-based providers) at Sprint TRS Carrier of Choice:

<u>Entity</u>	<u>CIC Code</u>
AT&T Communications	0288
Bell South Long Distance	0377
Bestline	0302
Birch Telecom	0678
Broadwing Communications	0948
Broadwing Telecommunications	0071
Cox Communications	6269
Excel Telecommunications, Inc.	0752
Global Crossings Telecommunications	0444
MCIWorldCom	0222
McLeod USA	0725
Qwest Communications	0432
SBC Communications Long Distance	5792
Souris River Telecommunications	0770
Sprint	0333
Telecomm*USA (MCIWorldCom)	0220, 0321, 0835, 0987
Touch America Services, Inc.	0244
U.S. Link	0355
VarTec dba Clear Choice Communications	0636
VarTec Telecom, Inc.	0465, 0638, 0811, 0899, 5111
Verizon Long Distance	5483
Winstar	0643
Working Assets	0649
WorldCom	0555, 0987
WorldXChange	0502, 0834

Updated: 8/12/07

## Attachment B

### Access Tandem Interconnection Locations

State	Access Tandem	Tandem CLI	Tandem LEC
Missouri	Kansas City	KSCYMO5503T	SBC
Texas	Ft Worth	FTWOTXED03T	SBC
North Carolina	Charlotte	CHRLNCCA05T	Bell South
South Carolina	Charleston	CHTNSCDT60T	Bell South
New York	Syracuse	SYRCNYSU50T	Verizon
Ohio	Dayton	DYTNOH225GT	Ameritech
South Dakota	Sioux Falls	SXFLSDCO09T	Qwest
North Dakota	Bismarck	BSMRNDBC12T	Qwest
Arkansas	Little Rock	LTRKARFR02T	Southwestern Bel
Florida	Miami	NDADFLGG01T	Bell South
California	Sacramento	SCRMCA0103T	Verizon / Pac Bel
Colorado	Denver	DNVRCOMA02T	Qwest
Illinois	Chicago	CHCGILNE50T	Ameritech
Minnesota	Owatonna	OWTNMNOW12T	Qwest
Wyoming	Cheyenne	CHYNWYMA03T	Qwest

Updated: 8/12/07

## Attachment C

### S A M P L E Letter of Authorization

< DATE >

<Name>, Account Manager

<Street1> <Street2>

<City>, <State> <Zip Code>

FAX: <Fax. No.>

This letter of authorization has been issued to give Sprint TRS permission to send < Toll Carrier Company Name > toll traffic associated with 1+, 0+, and 0- and International dialing through Sprint TRS at the < Regional COC Tandems >.

#### 1. Regional COC Tandems

You will need to provide Sprint with the following:

Toll Carrier: < insert name>

CIC Code: <insert CIC>

Underlying Toll Carrier: <insert name>

Underlying Carrier CIC Code: <insert CIC>

Choose Tandem Below

State	Access Tandem	Tandem CLLI	Tandem LEC
Missouri	Kansas City	KSCYMO5503T	SBC
Texas	Ft Worth	FTWOTXED03T	SBC
North Carolina	Charlotte	CHRLNCCA05T	Bell South
South Carolina	Charleston	CHTNSCDT60T	Bell South
New York	Syracuse	SYRCNYSU50T	Verizon
Ohio	Dayton	DYTNOH225GT	Ameritech
South Dakota	Sioux Falls	SXFLSDCO09T	Qwest
North Dakota	Bismarck	BSMRNDBC12T	Qwest
Arkansas	Little Rock	LTRKARFR02T	Southwestern Bel
Florida	Miami	NDADFLGG01T	Bell South
California	Sacramento	SCRMCA0103T	Verizon / Pac Bel
Colorado	Denver	DNVRCOMA02T	Qwest
Illinois	Chicago	CHCGILNE50T	Ameritech
Minnesota	Owatonna	OWTNMNOW12T	Qwest
Wyoming	Cheyenne	CHYNWYMA03T	Qwest

Updated 8/12/07

## 2. Call Type Restrictions

< Toll Carrier Brand Name > will accept any intrastate, international and operator services call types that will be routed to the < tandem location(s) > tandems.

### OR

< Toll Carrier Brand Name > will accept any (*specify intrastate, interstate, international, and operator services*) call types except for (*specify what call types and restrictions*) that should not be routed to the < tandem location > tandems.

If there are any questions regarding this letter of authorization, please contact < Name >, < Job Title >, < Department Name > at xxx-xxx-xxxx.

Sincerely, < Name >< Job Title >, < Department Name >

## **Attachment F: Sprint Route Outage Prevention Programs**

### **Call Before You Dig Program**

This program uses a nationwide 800 number interlinked with all local/state government utility agencies as well as contractors, rail carriers, and major utilities. Sprint currently receives in excess of 60,000 calls per month for location assistance over the 23,000-mile fiber network.

### **Awareness Program**

This Sprint program proactively contacts local contractors, builders, property owners, county/city administrators, and utility companies to educate them on Sprint's cable locations and how each can help eliminate cable outages.

### **Route Surveillance Program**

This is a Network Operations department program using Sprint employees to drive specific routes (usually 120 miles) and visually inspect the fiber cable routes. This activity is performed an average of 11.6 times per month or approximately once every 2-3 days.

### **Technician Program**

Technicians are stationed at strategic locations and cover an area averaging 60 route miles. Each technician has emergency restoration material to repair fiber cuts on a temporary basis. Other operations forces within a nominal time frame accomplish total repair.

### **Fiber/Switch Trending Program**

This includes a weekly summary of equipment failure events highlighting bit error rate (BER) and cable attenuation. As a result, Sprint identifies potential equipment problems and monitors performance degradation to establish equipment-aging profiles for scheduled repair, replacement, or elimination. Aging profiles are computer-stored representations of the characteristics of a fiber splice. The profile is stored at the time the splice is accepted and put into service. A comparison of the original profile and current profile are compared for performance degradation. Maintenance is scheduled based on this type of monitoring.

### **Network Management and Control Systems**

The Sprint network is managed and controlled by a National Operations Control Center (NOCC) located in Overland Park, KS. As a back up, a secondary NOCC is located in Lenexa, KS. The NOCC is designed to provide a national view of the status of the network as well as to provide network management from a centralized point. The NOCC interfaces with the Regional Control Centers (RCCs) to obtain geographical network status. The RCCs are responsible for maintenance dispatch and trouble resolution, and are designed to provide redundancy for each other and back-up status for the NOCC.

The NOCC and RCC work closely with the ESOC in cases where a network problem may affect Missouri operations. In cases such as these, the NOCC or RCC immediately alerts the ESOC of the situation so that appropriate steps can be taken to minimize service impacts. The NOCC and RCCs also serve as reference points for the ESOC when problems are detected in the TRS center that are not the result of internal center operations.

## Network Management

Commitment to a digital fiber optic network permits Sprint to use a single transmission surveillance protocol to integrate internal network vendor equipment. This enhances Sprint's ability to automate and provide preventive, near real-time detection and isolation of network problems. The controlling principle is identification and correction of potential problems before they affect the Missouri call capabilities.

Sprint divides the major functional responsibilities, facilities maintenance and network management, into a two-level organization which maximizes network efficiencies and customer responsiveness. The first level consists of the RCCs located in Atlanta and Sacramento. RCC personnel focus on the performance of individual network elements within predetermined geographical boundaries. The second level is the NOCC in Kansas City that oversees traffic design and routing for Sprint's 23,000-mile fiber optic network and interfaces.

This two-level operational control organization, combined with architectural redundancies in data transport and surveillance, control and test systems, ensures an expedited response to potential problems in both switched and private line networks.

In the event of a power outage, the UPS and backup power generator ensure seamless power transition until normal power is restored. While this transition is in progress, power to all of the basic equipment and facilities essential to the center's operation is maintained. This includes:

- Switch system and peripherals
- Switch room environmentals
- CA positions (consoles/terminals and emergency lights)
- Emergency lights (self-contained batteries)
- System alarms
- CDR recording

As a safety precaution (in case of a fire during a power failure), the fire suppression system is not electrically powered. Once the back-up generator is on line, stable power is established and maintained to all TRS system equipment and facility environmental control until commercial power is restored.

### **CAPTEL OUTAGE PREVENTION**

Sprint will provide FCC compliant *CapTel* service from the two *CapTel* Service Centers in Madison and Milwaukee, WI. Sprint's *CapTel* vendor *CapTel Inc.* (CTI) operates the two current *CapTel* Service Centers in the nation. These unique Centers operate with enough terminals for 200 agents each, along with support personnel, Technicians, and Supervisors.

Both *CapTel* Service Centers are equipped with redundant systems for power, ACD/telecom switching equipment, call processing servers, data network servers, and LAN gear. Most equipment failures can be corrected without complete loss of service.

Having two *CapTel* Service Centers ensures minimum interruptions in service if something unexpectedly halts operations in one Center or the other such as a flood or a tornado. In those instances, traffic from one Center can automatically be routed to the other.

## **Attachment G: Disaster Recovery Plan**

Sprint's comprehensive Disaster Recovery Plan developed for Missouri details the methods Sprint will utilize to cope with specific disasters. The plan includes quick and reliable switching of calls, network diagrams identifying where traffic will be rerouted if vulnerable circuits become inoperable, and problem reporting with escalation protocol. Besides service outages, the Missouri Disaster Recovery Plan applies to specific disasters that affect any technical area of Sprint's Relay network.

The first line of defense against degradation of Missouri is the Intelligent Call Router (ICR) technology that Sprint employs. During a major or minor service disruption, the ICR feature bypasses the failed or degraded facility and immediately directs calls to the first available agent in any of Sprint's eleven fully inter-linked TRS Call Centers. State-specific call processing software resides at each of Sprint's Relay Call Centers. Communications Assistants (CAs) are trained in advance to provide service to other States; the transfer of calls between centers is transparent to users.

Beyond the ICR, Sprint's Disaster Recovery Plan details the steps that will be taken to deal with any problem, and restore Missouri to its full operating level in the shortest possible time.

### **Missouri Notification Procedure**

To provide Missouri with the most complete and timely information on problems affecting their TRS, the trouble reporting procedure for Missouri will include three levels of response:

- A 3-hour verbal report
- A 24-hour status report
- A comprehensive final report within 5 business days

Sprint will notify the Missouri TRS contact person within three hours if a service disruption of 30 minutes or longer occurs. For service disruptions occurring outside normal business hours, the initial report will be provided by 8:30 AM on the next business day. This initial report will explain how the problem will be corrected and an approximate time when full service will be restored. Within 24 hours of the service disruption, an intermediate report provides problem status and more detail of what action is necessary. In most cases, the 24-hour report reveals that the problem has been corrected and that full service to Missouri has been restored. The final comprehensive written report, explaining how and when the problem occurred, corrective action taken, and time and date when full operation resumed will be provided to the Missouri Administrator within five business days of return to normal operation. Examples of service disruption Missouri include:

- ACD failure or malfunction
- Major transmission facility blockage
- Threat to Missouri CA's safety or other CA work stoppage
- Loss of CA position capabilities

Performance at each Sprint relay center is monitored continuously 24 hours a day, seven days a week from Sprint's Enhanced Services Operation Control Center (ESOCC) in Overland Park, KS.

## Disaster Recovery Procedures

If the problem is within the relay center serving Missouri, maintenance can usually be performed by the on-site technician, with assistance from Sprint's ESOC. If the problem occurs during non-business hours and requires on-site assistance, the ESOC will page the technician to provide service remedies. Sprint retains hardware spares at each center to allow for any type of repair required without ordering additional equipment (except for complete loss of a center).

## Time Frames for Service Restoration

### Complete or Partial Loss of Service Due to Sprint Equipment or Facilities

- **Sprint Call Center Equipment** - A technician is on-site during the normal business day. The technician provides parts and / or resources necessary to expedite repair within two hours. Outside of the normal business day a technician will be on-site within four hours. The technician then provides parts and /or resources necessary to expedite repair within two hours.
- **Sprint or Telco Network Facilities** - For an outage of facilities directly serving Missouri, incoming TRS calls will immediately be routed to one of ten other centers throughout the US. No calls will be lost. Repair of fiber or network facilities typically requires less than eight hours.
- **Due to Utilities or Disaster at the Center** - Immediate rerouting of traffic occurs with any large-scale center disaster or utility failure. Service is restored as soon as the utility is restored, provided the Sprint equipment has not been damaged. If the equipment has been damaged the service restoration for Sprint equipment (above) applies.
- **Due to Telco Facilities Equipment** - A Telco equipment failure will not normally have a large effect on TRS traffic within the state unless it occurs on Telco facilities directly connected to the call center. In this case, normal Sprint traffic rerouting will apply. For a failure at a telco central office - In (CITY), for example, only local (CITY) residents would be affected until the Telco has performed the necessary repairs. For situations like this, it will be at Sprint's discretion to dispatch a technician. The normal Telco escalation procedures will apply. The Telco escalation process is all during the normal business day; therefore, a trouble may be extended from one day to the next.

## Trouble Reporting Procedures

The following information is required when a Missouri user is reporting trouble:

- Service Description (Missouri)
- Caller's Name
- Contact Number
- Calling to/Calling from (if applicable)
- Description of the trouble

Service disruptions or anomalies that are identified by Missouri users may be reported to the Sprint Relay Customer Service 800 number (800-877-0996) at any time day or night, seven days a week. The Customer Service agent creates a trouble ticket and passes the information on to the appropriate member of Sprint's Maintenance Team for action. Outside the normal business day, the ESOC will handle calls from the Customer Service agents 24 hours a day, 7 days a week.



The Maintenance Team recognizes most disruptions in service prior to customers being aware of any problem. Site technicians are on call at each of Sprint's 11 TRS Call Centers to respond quickly to any event, including natural disasters.

### Mean Time to Repair (MTTR)

MTTR is defined and detailed in Tables A-1 and A-2:

Table A-1 Time to Investigate + Time to Repair + Time to Notify

<b>Time to Investigate</b>	The time needed to determine the existence of a problem and its scope.
<b>Time to Repair</b>	Repair time by Field Operations plus LEC time, if applicable.
<b>Time to Notify</b>	From the time repair is completed to the time the customer is notified of repair completion.

Table A-2 Current MTTR Objectives

<b>Switched Services</b>	8 Hours
<b>Private Lines</b>	4 Hours (electronic failure)
<b>Fiber Cut</b>	8 Hours

Sprint's Mean Time to Repair is viewed from the customer's perspective. A critical element in the equation is the Time to Notify, because Sprint does not consider a repair complete until the customer accepts the circuit back as satisfactory.

### Escalation Procedures

If adequate results have not been achieved within two hours, a Missouri user may escalate the report to the next level. Table A-3 details the escalation levels.

Table A-3 Escalation Levels

<b>Escalation Level</b>	<b>Contact</b>	<b>Phone</b>
<b>2</b>	Regional Maintenance Manager	Office Phone Number (913) 253-4394 Cell Phone Number Cell Phone 913-484-2263
<b>3</b>	Senior Manager, Technical Staff	Office Phone Number (913) 253-4396

### Service Reliability

Sprint's service is provided over an all-fiber sophisticated management control networks support backbone networks with digital switching architecture that. These elements are combined to provide a highly reliable, proven, and redundant network. Survivability is a mandatory objective of the Sprint network design. The Sprint network minimizes the adverse effect of service interruptions due to equipment failures or cable cuts, network overload conditions, or regional catastrophes.

A 100 percent fiber-optic network, with significant fiber miles in Missouri, provides critical advantages over the other carriers. These advantages include:

- **Quality**

Since voice or data are transmitted utilizing fiber optic technology, the problems of outdated analog and even modern microwave transmission simply do not apply. Noise, electrical interference, weather-impacting conditions, and fading are virtually eliminated.

- **Economy**

The overall quality, architecture, and advanced technology of digital fiber optics makes transmission so dependable that it costs us less to maintain, thereby passing the savings onto our customers.

- **Expandability**

As demand for network capacity grows, the capacity of the existing single-mode fiber can grow. Due to the architecture and design of fiber optics, the capacity of the network can be upgraded to increase 2,000-fold.

- **Survivability**

Network survivability is the ability of the network to cope with random disruptions of facilities and/or demand overloads. Sprint has established an objective to provide 100 percent capability to reroute backbone traffic during any single cable cut. This is a significant benefit to Missouri, and a competitive differentiation of the Sprint network.

Currently, Sprint has over 23,000 miles of its fiber network in place and in service, with a fiber point of presence (POP) in every Local Access Transport Area (LATA). The four LATAs in Missouri are served by 38 Sprint POPs. There are plans for additional fiber mileage, additional POPs, and added route diversity. There are more than 300 POPs in service on the network. With 38 POPs in the state, all areas will be adequately serviced by Sprint.

Switched services are provided via 49 Northern Telecom DMS-250/300 switches at 29 locations nationwide. Three DMS-300s located at New York, NY; Fort Worth, TX; and Stockton, CA, serve as international gateways. The remaining 46 switches provide switching functions for Sprint's domestic switched services. Missouri would primarily be served by the DMS switches in Cape Girardeau, Chesterfield, Columbia, Jefferson, Joplin, Ferrelview, Kansas City, Lake Ozark, Moberly, O'Fallon, Rolla Springfield, St. Joseph, St. Louis, Warrensburg and Wentzville, with other diversely located facilities also serving Missouri.

Interconnection of the 49 switches is provided in a non-hierarchical manner. This means that inter-machine trunk (IMT) groups connect each switch with all other switches within the network. Each of these IMT groups is split and routed through the Sprint fiber network over SONET route paths for protection and survivability. As an extra precaution to preclude any call blockage, Dynamically Controlled Routing (DCR) provides an additional layer of tandem routing options when a direct IMT is temporarily busy.

Reliability is ensured through a corporate commitment to maintain or surpass our system objectives. Beginning with the network design, reliability and efficiency are built into the system. Sprint continues to improve the network's reliability through the addition of new technologies such as Digital Cross-connect Systems, SONET, and Signaling System 7.

The effectiveness of this highly reliable and survivable network is attributed to the redundant transmission and switching hardware configurations, SONET ring topology, and sophisticated

network management and control centers. These factors combine to assure outstanding network performance and reliability for Missouri.

### **Network Criteria**

#### **System Capacity**

The Sprint network was built with the capacity to support every interLATA and intraLATA call available in the US. With the continuing development of network fiber transmission equipment to support higher speeds and larger bandwidth, the capacity of the Sprint network to support increasing customer requirements and technologies is assured well into the future.

## Sprint Outage Notification from *CapTel*/Service Center

Performance at the *CapTel*/Service Center is monitored continuously by CTI technicians 24 hours a day, seven days a week. Sprint will be notified by the *CapTel* Service Center Manager immediately upon determination of any type of natural or man-made problem that causes either:

- A complete (100 percent) loss of the *CapTel*/Service Center, OR
- Any partial loss of service in excess of 15 minutes that is service affecting. Examples of such a loss in service include:
  - An accidental switch rebooting
  - Loss of transmission facilities through the telephone network
  - Terrorist attack
  - Bomb threat or other work stoppage
  - Sudden loss of agent position capabilities.
  - Impact to minimum ASA / Speed of Answer times
  - Acts of God

Contact from the *CapTel*/Service Center Manager or designated CTI contact person will be made to the assigned contact people at Sprint immediately upon awareness of an outage meeting the above criteria, 24 hours a day, seven days a week including holidays with the following documentation:

- 1) What time did the outage happen in CENTRAL TIME?
- 2) What caused it?
- 3) Which customers are (or were) impacted?
- 4) What is (was) the solution to restore service?
- 5) What is the time that service will be (or was restored by) IN CENTRAL TIME?

## Sprint Procedure for Outage Notification to Contract Administrators during Business Hours

Upon receiving notification from CTI during business hours (8AM to 5PM CT), Sprint will have one of the below managers contact the Contract Administrator, depending on availability:

	Point of Contact (POC)	Position	Contact Information:
1	John Moore	Relay Program Management Mgr	P: (925) 468-4345 M: (925) 895-9176 E: <a href="mailto:John.E.Moore@sprint.com">John.E.Moore@sprint.com</a>
2	Angela Officer	Relay Program Manager	P: (703) 689-5654 E: <a href="mailto:Angela.Officer@sprint.com">Angela.Officer@sprint.com</a>
3	Assigned On-Call Relay Program Manager	Relay Program Manager	Assigned as necessary

Upon receiving notification from CTI, Sprint will assess the problem and contact will be made by email to the Contract Administrator.

In cases of partial loss of service, such as several inoperable CA positions or, local area network outages, the *CapTel* Center on-site technician will notify *CapTel* Service Center to schedule repair. Only those partial losses of service that are service affecting in excess of 15 minutes will be email to the state Contract Administrator.

If the problem is within the *CapTel* Center, maintenance can usually be performed by the on-site technicians. Hardware spares are retailed at the *CapTel* Service center to allow for the most common type of repair required without the ordering of additional equipment.

### **Sprint Procedure for Outage Notification to Contract Administrators outside of Business Hours**

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Upon receiving notification from CTI outside of business hours (5PM to 8AM CT, Monday through Friday, and all day Saturday, Sunday and holidays), John Moore (or Angie Officer) will notify Contract Administrators immediately by email of an outage if possible, but by no later than 8AM CT the next business day. Follow-ups and post-mortem will still be provided within the required guidelines.

### **Disaster Recovery Follow-Up**

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Upon notifying customers of an outage, Sprint's contact person will provide regular updates from CTI to all customers and internal team members. The follow up will be kept in sync with *CapTel* Customer Service so that the information shared with customers from CTI is the same as what customers receive from Sprint.

### **Disaster Recovery Post-mortem documentation**

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72 hours (3 days) after the outage is resolved, CTI will need to provide a formal written analysis of the outage to the designated Sprint people (outlined above).

Sprint will send a document with the analysis to the Contract Administrator. John Moore will be the primary point of contact for the letter to be shared with customers. If John Moore is not available, then Angie Officer will provide the letter directly to customers.

- 1) What time did the outage happen in CENTRAL TIME?
- 2) What caused it?
- 3) Which customers are or were impacted?
- 4) What is the solution to restore service?
- 5) What is the time that service will be or was restored IN CENTRAL TIME?
- 6) What will *CapTel*, Inc do to prevent this from happening again?

CTI will be available to answer questions from Contract Administrators through Sprint.

## Time Frames for Service Restoration

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Complete loss of service due to equipment -

- Normal business day – A technician is on site during the normal business day. The technician will provide parts and/or resources necessary to expedite repair of the most common problems within two (2) hours.
- Outside of the normal business day – A technician will be on-site within four (4) hours. The technician will then provide parts and/or resources necessary to expedite repair of the most common problems within two (2) hours.

Due to Utilities or Disaster at the Center – Service will be restored as soon as the utility is restored provided the equipment was not damaged. If the equipment was damaged then refer to the timing in the statement previous (Due to Equipment).

Due to Telco Facilities Equipment – A technician will be dispatched as necessary. The normal Telco escalation procedures for a partial outage will apply:

- Two hours at first level
- Four hours at second level
- Eight hours at third level

These hours of escalation are all during the normal business day, so a trouble ticket may be extended from one day to the next.

Partial loss of service – Due to Equipment

- Normal business day – A technician is on site during normal business hours. The technician will provide parts and/or resources necessary to expedite repair of the most common problems within four (4) hours.
- Outside of the normal business day – A technician will be on-site within eight (8) hours. The technician will then provide parts and/or resources necessary to expedite repair of the most common problems within four (4) hours.

Due to Position Equipment – A technician will be on-site within eight (8) hours, provided there are not enough positions working to process the forecasted traffic volumes. The technician will provide parts and/or resources necessary to expedite repair within 48 hours. If there are enough positions functional to process the forecasted traffic, the equipment will be repaired as necessary by Sprint.

Due to Telco Facilities Equipment – A technician will be dispatched as necessary by Sprint. The normal Telco escalation procedures for a partial outage will apply:

- Eight hours at first level
- Twenty-four hours at second level

These hours of Telco escalation are all during the normal business day, so a service request may be extended from one day to the next.

### **Trouble Reporting Procedures (for Individual Customers to Customer Service)**

All calls concerning customer service issues should be placed by dialing the *CapTel*/Customer Service at 1-888-269-7477 (800-482-2424 TTY) in English only. A Customer Service agent will take information concerning:

- Caller's Name
- Contact Number
- Calling to / Calling from (if applicable)
- Description of the trouble

Report service affecting trouble to Customer Service during normal business hours, 8:00 AM to 5:00 PM Central Time, Monday through Friday. Normal business hours do not include Saturday, Sunday, and holidays.

Escalations of service affecting issues during normal business hours are followed below:

Level	Escalation Procedure during business hours	Point of Contact (POC)	Phone Number
1	<i>CapTel</i> Customer Service	Customer Service Agent	(888) 269-7477 <a href="mailto:CapTel@CapTelmail.com">CapTel@CapTelmail.com</a>
2	<i>CapTel</i> Customer Service Supervisor	Pam Holmes	(888)-269-7477 <a href="mailto:Pam.Holmes@CapTelmail.com">Pam.Holmes@CapTelmail.com</a>
3	Captioned Telephone Inc.'s (CTI) Call Center Director	Pam Frazier Call Center Director	(877) 437-4660 <a href="mailto:Pam.Frazier@CapTelmail.com">Pam.Frazier@CapTelmail.com</a>

Table 4 – *CapTel* Customer Service Escalation Procedures

Hours outside the normal business day are 5:00 PM to 8:00 AM Central Time for every day of the week (Monday through Friday), and all day Saturday, Sunday, and holidays. Outside of normal business day hours, a recording will play and trouble calls can leave a message for customer service to follow up during the next business day.

The recording played to customers outside of *CapTel*/customer service business hours:

Thank you for calling *CapTel*/customer service. Our hours are Monday through Friday from 8AM to 5PM central time. You may try again during business hours or leave a voice mail message by pressing 3 now.

If the "3" button is pressed, then the customer will hear the following message:

Thank you for calling *CapTel* customer service. We are unable to take your call at this time. Please leave a detailed message with your name and phone number with area

code, or email address, and a reason for your call, and one of our representatives will return your call as soon as possible.

#### Alternative usage for *CapTel* phone during outage for VCO users.

*CapTel* phones are equipped with the capability to connect to traditional relay services even in the event that the captioning service is not available.

In the event that a user cannot reach the captioning center, and the user desires to use any form of available relay to connect their call, the user can dial 711 (user must dial only 711 and not a relay 800 number in order to change to VCO mode) and be connected to the in-state relay call center. Their call will be processed via VCO instead of captions. In VCO mode, no audio from the called party will be processed – just like any other traditional VCO call.



## Attachment H: Sprint TRS Standard Features Matrix

Mandatory Features	Description/Benefits	Cost
Answering Machine Retrieval	This feature allows Relay callers to retrieve their answering machine or voice-mail messages through the CA (Relay Agent, Relay Operator, Communication Assistant), referred to in this document as “CA”.	No Additional Cost
ASCII Split Screen	The feature enables an ASCII user to communicate with the Relay in full duplex mode. Similar to voice-to-voice conversation, it provides interrupt capability as appropriate for the ASCII user and the voice party.	No Additional Cost
Automated Number Identification (ANI) Technology	ANI is the telephone number of the line initiating a call. The number is identified by the switch and passed over the network to the CA workstation.	No Additional Cost
CA Typing Speed	Text transmission of 60 wpm.	No Additional Cost
CA 10-minute In-call replacement	CAs are required to stay with a TRS call for a minimum of 10 minutes and with a STS call for minimum of 15 minutes.	No Additional Cost
Caller ID	Caller ID featuring SS7 technology is used to deliver the ten digit phone number of the calling party, when not blocked through the LEC for local and toll calls.	No Additional Cost
Call Response Time	Call response time is measured from the time it takes the call to hit the CA position from the Relay Center call controller switch. Sprint will adhere to the State’s requirements regarding answer time.	No Additional Cost
Background Noises	During the call, TTY callers will be informed of background noises through CA’s tying in parenthesis.	No Additional Cost
Beepers and Pagers	Sprint provides functionally equivalent pager calls, which are made to beepers and pagers, interactively and non-interactively. Calls are relayed between interactive paging services and the Relay users. For non-interactive paging services, calls are made to leave specific numeric information to accomplish those calls.	No Additional Cost
Branding of Call Type - Temporary	This feature refers to the system’s ability to answer an incoming call based on the previous call in the caller’s communication mode (TTY, Voice, ASCII, VCO, HCO, Spanish, Turbo Code, Deaf-Blind).	No Additional Cost
Branding of Call Type – Permanent	This feature refers to the system’s ability to brand the caller’s preferred communication mode – TTY, Voice, ASCII, VCO, HCO, Spanish, Turbo Code, Deaf-Blind – permanently.	No Additional Cost
Carrier-of-Choice	This feature allows Relay callers to choose their preferred Carrier for interstate/international and in some cases intra-island calls.	No Additional Cost
Cellular/PCS Phone Access	Allows Relay Cellular customers to reach the Relay 800 number(s) to complete Relay calls.	No Additional Cost
Custom Calling Services	Through the Customer Database feature, this feature allows Relay callers to have traditional LEC services i.e. frequently called numbers.	No Additional Cost
Customer Database	Allows Relay callers to enter specific information in a profile i.e. Carrier-of-Choice, emergency numbers, last number redial, customer notes, frequently dialed numbers, etc. to expedite their call set-up time.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Name and Address	This information could save valuable time when calling emergency services.	No Additional Cost
Long Distance profile	Callers' preferred Carrier for in-State and out-of-state long distance calls. Callers can also indicate their preferred billing option when placing long distance calls.	No Additional Cost
Frequently Dialed Numbers	This feature allows users to set up and access "speed dial" calls through the Relay.	No Additional Cost
Outdial Information	This feature allows the CA to be aware as to how the caller answers the phone and which language type they will communicate in.	No Additional Cost
Customer Notes	This feature informs the CA of special requests to handle calls i.e. "do not announce the service", preferred CA gender, etc.	No Additional Cost
Outdial Restrictions	Callers may restrict the type of call i.e. long distance, international, 900, etc. to be placed through the Relay.	No Additional Cost
Emergency Numbers	Callers may enter emergency numbers such as fire, doctor, police, etc. to expedite the emergency call processing.	No Additional Cost
Customized 800 Access	Each State has dedicated Relay 800 numbers to access the Relay service.	No Additional Cost
Deaf-Blind Pacing (Slow-typing)	This feature provides functionality that automatically slows the transmission of data to Deaf-Blind users. The default speed is 15 wpm and the speed can be increased at the caller's request in 5-wpm increments.	No Additional Cost
Delayed Call Announcer	Sprint sends a delayed call announcer when the call is not answered within 30 seconds. The feature alerts Relay callers that they are on-line and on hold for next available CA.	No Additional Cost
Dialed Number Verification	This feature echoes the number being outdialed and the call type in the TTY Dial string macro. This feature helps TTY callers know if a number has been misdialled and the type of call they are placing.	No Additional Cost
Directory Assistance (Intrastate/Interstate)	This feature allows Relay callers to reach Directory Assistance at rates no greater than that of traditional voice users. When the number is obtained, the caller may choose to place the call through the Relay or dial direct.	No Additional Cost
Emergency Assistance	This service provides emergency assistance for Relay callers through Sprint's E911 database and/or their Customer Database profile.	No Additional Cost
Enhanced Modems	Sprint's TRS modems support enhancements in ASCII communication protocols. The capabilities of Sprint's modems include auto detection; connections with modems up to 14.4k; and faster ASCII detection (3 seconds).	No Additional Cost
Error Correction	Sprint Relay workstations are equipped with the Error Correction capability to automatically correct common typographical errors and spell out abbreviations, while increasing typing speed and reducing conversational minutes.	No Additional Cost
Gender ID	This feature provides the gender of CAs in the TTY greeting macro.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Hearing-Carry-Over (HCO)	HCO allows speech-disabled or mute users with normal hearing to listen to the person they are calling. The HCO user types his/her conversation for the CA to read and voice to the standard (voice) telephone user.	No Additional Cost
HCO-HCO	HCO users can contact HCO users through the Relay. The CA will voice to both parties what is typed on each user's TTY.	No Additional Cost
HCO Permanent Branding	The permanent branding enables HCO callers to listen during call set-up. The HCO brand greeting macro is: [STATE]RELAY 1234F YOU MAY HEAR VOICE OR USE TTY GA	No Additional Cost
HCO-TTY	HCO users can contact TTY users through the Relay. HCO users can listen while the CA is reading/voicing the TTY user's typed message. The HCO user types their conversation directly to the TTY user.	No Additional Cost
Voice-Carry-Over (VCO)	VCO allows Deaf or Hard-of-Hearing people who prefer to use their own voice to speak directly to the party they are calling. The CA types the voiced responses back to the VCO user who can read the typed messages across the TTY screen.	No Additional Cost
Two-line VCO	This feature allows VCO callers with two telephone lines to use one line to speak directly to the hearing person while the other line is used to receive the CA's typed responses simultaneously. Two-Line VCO offers a more natural flow of conversation without pauses required with single line calls.	No Additional Cost
Reverse 2-Line VCO	This feature is similar to Two-line VCO. In R2LVCO, a VCO user receives a call from a voice user first then dials/connects the Relay CA.	No Additional Cost
VCO-HCO	VCO users can contact HCO users through the Relay. The VCO user speaks directly to the HCO user and the HCO user types their conversation directly to the VCO user.	No Additional Cost
VCO-VCO	VCO users can contact other VCO users through the Relay. The CA listens to VCO users speak and type the spoken words for the parties at both ends.	No Additional Cost
VCO-TTY	VCO users can contact TTY users through the Relay. The VCO user can use his/her own voice and the CA will listen to the VCO caller's spoken words then type the message to the TTY user. The TTY user types directly to VCO user without any CA interaction.	No Additional Cost
VCO w/ Privacy/NO GA	This is similar to the standard VCO feature however; the CA will not hear the VCO caller speaking through the Relay. The CA will only type voiced responses back to the VCO user.	No Additional Cost
VCO Permanent Branding	This feature enables VCO callers to set-up the call without typing. The permanent VCO brand greeting macro would be: [STATE]RELAY 1234F VOICE (OR TYPE) NOW GA	No Additional Cost
Inbound International	From any international destinations outside of United States, callers can reach the Relay through Sprint's international inbound 10-digit number- 605-224-1837.	No Additional Cost
Intelligent Call Router	Dynamic Call Routing technology automatically and seamlessly routes Relay calls to the first available English or Spanish CA in the network.	No Additional Cost
Intercept Message	This feature provides intercept messages in voice and TTY in event of system failure occurrence within the Relay switch, Center, or outbound circuits.	No Additional Cost



Mandatory Features	Description/Benefits	Cost
Last Number Redial	Relay users can request the CA to redial their last number. Sprint TRS is designed to store the user's last number dialed and it is dialed upon the user's command, "LAST NUMBER REDIAL PLS GA" OR "LNR GA".	No Additional Cost
Local/Extended Area Service	Callers who subscribe to extended area service plans will receive equivalent service through the Relay.	No Additional Cost
Machine Recording Capabilities	This feature reduces redials when CAs receive audio-text interaction machines. In most cases, it allows the callers to receive all of the information on the first call and eliminates the number of redials.	No Additional Cost
Restricted 800/888/877/866/855	This feature allows Relay callers to reach regionally restricted or regionally directed 800/888/877/866/855 toll-free numbers.	No Additional Cost
Spanish-to-Spanish	Sprint offers Spanish Services, which offers Spanish-to-Spanish Relay service, which are handled by proficient bilingual (Spanish) CAs. Their workstations are modified to provide macros and other functions to the caller in Spanish.	No Additional Cost
Speech Disabled Indicator	The command "S" typed by a Speech-Disabled person would inform the CA that a Speech-Disabled person is on the line.	No Additional Cost
Speech-to-Speech	This service enables Speech-Disabled customers to use their voice, with assistance from CA if necessary, to communicate with each other through the Relay.	No Additional Cost
Text/Voice Transmission	This feature offers the ability to toggle between inbound TTY, ASCII, TurboCode™, and Voice calls.	No Additional Cost
Toll Discounts	When calls are carried over the Sprint network, intrastate calls are typically discounted by 35% Day, 25% Evening, and 10% Night/ Weekend off intrastate MTS rates and interstate calls are discounted by 50% off interstate MTS rate. State specific requirements may result in a change to the standard discounts.	No Additional Cost
Transfer Gate capabilities	Sprint's system has the capability of transferring Relay callers to English TTY Operator Service and Relay 24-hour Customer Service.	No Additional Cost
TRS Customer Service	Relay users can reach Sprint's TRS Customer Service, which is available 24 hours-a-day, 7 days-a-week to request information, or to offer commendations and submit complaints. The toll-free number is: 1-800-676-3777 TTY/Voice/ASCII/Spanish.	No Additional Cost
TTY Operator Services (OSD)	Sprint's TTY Operator services can complete TTY-to-TTY calls; obtain Directory Assistance information; or receive credit for erroneous billing. The toll-free number is: 1-800-855-4000.	No Additional Cost
TurboCode™	This feature allows enhanced baudot transmission speed up to 110 words-per-minute. It enables TTY callers with TurboCode™ capability to interrupt during the transmission of the call.	No Additional Cost
Variable Time Stamp Macro	This feature (macro) enables Relay callers to know when their called party had disconnected and relays the last spoken words.	No Additional Cost
Voice Call progression	This system upgrade allows Voice or HCO callers to listen during call set-up i.e. ringing, busy.	No Additional Cost
Voice Gender ID	This feature (macro) informs the outbound TTY caller the gender of their caller.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Pay-Per-Call	Sprint provides access to Pay-Per-Call Services (900) via a toll-free 900 number which observes LEC restrictions so that customers do not have to register blocks with the Relay.	No Additional Cost
7-1-1	With cooperation of Local Exchange Companies, the Relay can accept 711 calls.	No Additional Cost

## **Attachment I: Policy on 10 and 15 Minute Rule**

Sprint understands that a change of CAs can interrupt the natural call flow. Therefore, Sprint strives to keep the same CA dedicated to each call. Sprint will ensure that the CA remains on the call for at least 10 minutes (or 15 minutes for Speech-to-Speech call). If a change of CA is unavoidable, CAs are trained to make this transition as smoothly as possible and will inform both parties.

A CA change may occur for the following reasons:

- Customer requests change of CA
- End user verbal abuse of CA or obscenity towards CA
- The call requires a specialist (Speech to Speech, another language)
- Illness
- Potential conflict of interest (i.e. the CA identifies an end user as a family member or friend)

In instances where it is necessary to change CAs, a second CA will plug in their headset at the position and watch the call for several minutes in order to assess the “spirit” of the call and make the transition smoother. After several minutes of observation, the second CA will wait until the voice person stops speaking and all conversation has been relayed and will then type to the TTY user:

**(CA# CONTINUING UR CALL).**

The CA will say to the non-TTY user:

**“THIS IS CA # CONTINUING YOUR CALL.”**

During initial training, trainees are required to practice this procedure. In addition, a training video was developed that clearly shows the procedure and how to ensure it is as smooth as possible.

## Attachment J: FCC TRS Mandatory Minimum Standards & Compliance Matrix

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
Provision of Services		
§ 64.603	<p>Each common carrier providing telephone voice transmission services shall provide, not later than July 26, 1993, in compliance with the regulations prescribed therein, throughout the area in which it offers services, telecommunications relay services, individually, through designees, through a competitively selected vendor, or in concert with other carriers.</p> <p>Speech-to-speech relay service shall be provided by March 1, 2001.</p> <p>Interstate Spanish language relay service shall be provided by March 1, 2001.</p> <p>In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.</p>	<p>Sprint has been a TRS provider since September 1, 1990. As of July 1, 2004, Sprint provides TRS to 32 States, the Federal Government, Common wealth of Puerto Rico, and three resellers.</p> <p>Sprint was the first TRS provider to offer Speech-to-speech relay service (California, 1996).</p> <p>Sprint was the first TRS provider to offer intrastate and interstate Spanish services (Texas, 1991). As a standard offering of TRS, Sprint provides Spanish services to the States. Sprint also is the only TRS provider to offer Spanish-speaking Customer Service.</p> <p>Sprint fully implemented 711 accesses for all of its States on October 1, 2001. Sprint Local and wireless divisions have implemented 711 access on September 15, 2001.</p>
Operational Standards		
§ 64.604 A.1	<p>Communications Assistant (CA) Competency Skills</p> <p>CAs are to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.</p> <p>CAs must be competent skills in typing, grammar, spelling, and interpretation of typewritten ASL, familiarity with hearing and speech disability cultures, languages, and etiquette.</p> <p>Typing Speed - 60 WPM with technological aids</p> <p>Oral-to-type tests</p>	<p>Sprint requires that all CAs have a high school graduate equivalency as a minimum qualification for the job.</p> <p>All CAs are tested and evaluated to ensure Relay skills meet the following FCC Guidelines. CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures and ASL translation.</p> <p>Each Sprint CA is required to take the 60 WPM typing test quarterly (four times a year).</p> <p>Sprint administers Oral-to-type tests.</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	VRS 'qualified' Interpreters	Sprint VRS interpreters are qualified interpreters that adhere to RID Code of Ethics.
§ 64.604 A.2	<p>Confidentiality &amp; Conversation Context</p> <p>CAs are prohibited from disclosing the content of any relayed conversation regardless of content</p> <p>Certain exceptions are provided for Speech-to-Speech calls.</p> <p>CAs are prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise</p>	<p>CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided.</p> <p>Sprint CAs are prohibited from disclosing any call content.</p> <p>STS CAs are permitted to retain info from a call in order to facilitate the completion of consecutive subsequent calls.</p> <p>CAs relay calls verbatim and do not alter relayed conversation.</p> <p>During the annual merit reviews, each CA reviews the confidentiality and code of ethics with his/her team supervisor.</p>
§ 64.604 A.3	<p>Types of Calls</p> <p>CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.</p> <p>TRS shall be capable of handling any type of call normally provided by common carriers.</p>	<p>CAs process all calls and never prohibit sequential calls or limit length of calls.</p> <p>Sprint TRS is capable of handling all call types normally provided by common carriers</p>
§ 64.604 A.4	<p>Handling of Emergency Calls</p> <p>Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate PSAP.</p> <p>A CA must pass along the caller's number to the PSAP when a caller disconnects before being connected to emergency services.</p>	<p>Via E911 database, Sprint automatically and immediately connects the caller to an appropriate PSAP.</p> <p>CAs pass along the caller's number to the PSAP when the caller disconnects prior to be connected to the emergency service.</p>
§ 64.604 A.5	<p>In-call Replacement of CAs</p> <p>CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of 10</p>	<p>TRS and VRS CAs stay on the call for a minimum of 10 minutes.</p>



FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	<p>minutes.</p> <p>STS CAs - 15 minutes.</p>	<p>STS CAs stay on the call for a minimum of 15 minutes.</p>
<p>§ 64.604 A.6</p>	<p><b>CA Gender Preferences</b></p> <p>TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.</p>	<p>Sprint users are able to request the gender of the CA. Sprint makes every effort to satisfy this request and to maintain the same gender during transfers.</p>
<p>§ 64.604 A.7</p>	<p><b>STS Called Numbers</b></p> <p>STS users must be provided the option to maintain a list of names and phone numbers that the STS user calls. When the STS user requests one of these names, the CA must repeat it and state the phone number to the STS user.</p> <p>This information must be transferred to any new provider.</p>	<p>Sprint offers STS users the option of maintaining a list of names and phone numbers. When the STS user requests a name, the STS CA will repeat the name and the number to user.</p> <p>Sprint will provide the STS user information to any new provider.</p>
<b>Technical Standards</b>		
<p>§ 64.604 B.1</p>	<p><b>ASCII &amp; Baudot</b></p> <p>TRS shall be capable of communicating with ASCII &amp; Baudot format at any speed generally in use.</p>	<p>Sprint TRS communicates with Baudot and ASCII in all speeds that are generally in use.</p> <p>The following Baudot codes are available on Sprint TRS' platform: Baudot 45.5, Baudot 50, Turbo Code, and E Turbo Code.</p>
<p>§ 64.604 B.2</p>	<p><b>Speed of Answer</b></p> <p>TRS shall include adequate staffing to ensure 85% of all calls answered within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold.</p> <p>Abandoned calls shall be included in the speed-of-answer calculation.</p> <p>Speed of Answer is to be measured on a daily basis.</p> <p>The system shall be designed to a P.01 standard.</p>	<p>Sprint ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold.</p> <p>Abandoned calls are included in the speed-of-answer calculation.</p> <p>Speed of Answer is measured on a daily basis.</p> <p>Sprint's system is designed to the P.01 standards.</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
§ 64.604 B.3	<p>Equal Access to IXCs</p> <p>TRS users shall have access to their chosen IXC carrier through the TRS and to all other operator services, to the same extent that such access is provided to voice users.</p>	<p>Sprint provides users with access to their IXC carrier through the Sprint Carrier of Choice program allowing for the same access that is provided to voice users.</p>
§ 64.604 B.4	<p>TRS Facilities</p> <p>TRS shall operate everyday, 24 hours a day.</p> <p>TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.</p> <p>Adequate network facilities shall be used in conjunction with TRS.</p>	<p>Sprint TRS is available 24 hours a day, everyday.</p> <p>Sprint has redundancy features that provide functional equivalency, including uninterruptible power for emergency use.</p> <p>Sprint's network facilities are sufficient to ensure that the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience.</p>
§ 64.604 B.5	<p>Technology</p> <p>No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecomm to people with disabilities.</p> <p>VCO &amp; HCO technology are required to be standard features of TRS.</p>	<p>Sprint is the nation's leader in the development and offering of technological features for TRS. Sprint has introduced over fifty key product enhancements including Split Screen ASCII, Customer Database, Turbo Code, E Turbo Code/Dial Through, Gated VCO, Voice call progression.</p> <p>Sprint provides VCO and HCO technology as standard features as well as several variations on these technologies.</p>
§ 64.604 B.6	<p>Voicemail &amp; Interactive Menus</p> <p>CAs must alert the TRS user to the presence of a recorded message &amp; interactive menu thru a hot key on the CA's terminal.</p> <p>TRS providers shall electronically capture recorded messages &amp; retain them for the length of the call, &amp; may not impose any charges for additional calls that must be made by the user in order to complete</p>	<p>CAs keep the user informed and notify of the presence of recorded messages and interactive menus. CA positions have hot key functionality that electronically capture recorded messages and retain them for the length of the call.</p> <p>Sprint does not charge for any additional calls necessary to complete call involving recorded or interactive menus.</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	<p>calls involving recorded or interactive messages.</p> <p>TRS will handle pay-per-calls.</p>	<p>Sprint was the first provider to process pay-per-calls (Texas, 1996).</p>
Functional Standards		
<p>§ 64.604 C.1</p>	<p><b>Consumer Complaint Logs</b></p> <p>States must maintain a log of complaints including all complaints about TRS to include minimum include the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution.</p> <p>States &amp; TRS providers shall submit to the FCC by July 1 of each year, summaries of logs indicating the number of complaints received for the 12-month period ending May 31.</p>	<p>Sprint maintains a log of all complaints. The log includes all of the required fields including the date, the nature, the date of resolution, and the explanation of resolution.</p> <p>Sprint provides summaries of the logs, which indicate the number of complaints received for a 12-month period ending May 31<sup>st</sup>.</p> <p>Sprint has submitted annual summary of Consumer Complaints log report:</p> <p>June 1, 2002-May 31, 2003 June 1, 2003-May 31, 2004 June 1, 2004-May 31, 2005 June 1, 2005-May 31, 2006 June 1, 2006-May 31, 2007</p>
<p>§ 64.604 C.2</p>	<p><b>Contact Persons</b></p> <p>States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS.</p>	<p>Sprint provides full support, including a primary point-of-contact, to contract administrators to meet FCC requirements.</p>
<p>§ 64.604 C.3</p>	<p><b>Public Access to Info</b></p> <p>Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions, in phone directories, DA services, &amp; incorporation of TTY numbers in phone directories, shall assure that callers are aware of all forms of TRS.</p>	<p>Sprint follows all FCC requirements for public access to information and publishes in directories, brochures and billing inserts, instructions for TRS including 711 access in phone directories, DA services and the incorporation of TTY numbers in phone directories to assure that callers are aware of all forms of</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	<p>Conduct ongoing education and outreach programs to publicize availability of 711 access.</p>	<p>TRS.</p> <p>Sprint regularly provides 711 dialing information in its education and outreach programs.</p>
<p>§ 64.604 C.4</p>	<p><b>Rates</b></p> <p>TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.</p>	<p>Sprint TRS users pay rates no greater than the rates paid for functionally equivalent voice communication services.</p>
<p>§ 64.604 C.5</p>	<p><b>Jurisdictional Separation of Costs</b></p> <p>(i) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for in the Commission's regulations</p> <p>(ii) Cost recovery, Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism</p> <p>(iii) Telecommunications Relay Services Fund - To be administered by the National Exchange Carrier Association, Inc. (NECA)</p>	<p>(i) Sprint follows FCC requirements in the jurisdictional separation of costs.</p> <p>(ii) Interstate TRS is recovered from all subscribers for every interstate service utilizing the shared-funding cost recovery mechanism.</p> <p>(iii) Sprint works with NECA for reimbursement of interstate minutes.</p>
<p>§ 64.604 C.6</p>	<p><b>Complaints</b></p> <p>(i) Referral of complaint,</p> <p>(ii) Intrastate complaint resolution,</p> <p>(iii) Jurisdiction of Commission,</p> <p>(iv) Interstate complaint resolution,</p> <p>(v) Complaint Procedures</p>	<p>The Sprint TRS Customer Contact process is fully compliant with all FCC Requirements.</p>



FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	<p>VCO-to-VCO</p> <p>This requirement is waived for Internet Relay and Video Relay Services through December 31, 2007. (§36)</p>	
Handling of Emergency Calls	<p>Required that all TRS facilities be able to pass emergency callers to the appropriate PSAP within twelve months of publication of this Order in the Federal Register (8/24/03). (§42)</p> <p>This requirement has been waived for Internet Relay and Video Relay Services. (under separate Orders for SRO and VRS)</p>	Sprint immediately connects emergency callers to an "appropriate" PSAP as defined by the FCC.
Answering Machine Message Retrieval	<p>This feature allows a TTY user to retrieve voice messages left on his or her voice mailbox or voice answering machine by an incoming call from a third party.</p> <p>Concluded that the answering machine retrieval to be provided on interstate and intrastate basis by 8/24/03. (§62)</p>	Sprint has provided the Answering Machine Retrieval since 1996.
Call Release	<p>Call release allows a CA to set up a TTY-to-TTY call that once set up does not require the CA to relay the relay the conversation.</p> <p>Ruled that once the CA signs off, or be "released," after the two TTY parties are connected, at this point, the call ceases to be a TRS call subject to the per-minute reimbursement." (§68)</p> <p>This requirement is waived for Internet Relay and Video Relay Services.(§76)</p>	<p>Sprint has provided the Call Release feature since 2003.</p> <p>Once a call is "released" from the CA workstation, the call is no longer a relay call and accordingly will not be charged to the state customer.</p>
Speed Dialing	<p>Speed dialing allows users to manually store a list of telephone numbers with designated speed dialing codes in the TRS user's consumer profile.</p> <p>This requirement is waived for Internet Relay and Video Relay Services.(§76)</p>	Sprint has provided Speed Dialing or Frequent Dialed Numbers feature since September 1, 1996.

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
Three-way Calling	<p>Three-way calling feature is generally arranged in one of two ways. (§73)</p> <p>1. The TRS consumer may request that the CA set up the call with two other parties</p> <p>or;</p> <p>2. The second way is to set up a three-way call is for TRS user to connect to two telephone lines at the same time from his or her premises by using the telephone's switch hook (or "flash") button.</p> <p>This requirement is waived for Internet Relay and Video Relay Services. (§76)</p>	<p>Sprint has supported three-way calling capabilities, from the customer's premises, since September 1, 1995.</p>

# Attachment K: FCC *CapTel*/Mandatory Minimum Standards & Compliance Matrix

FCC 03-112 Attachment D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Provision of Services			
<p>§ 64.603</p>	<p>Each common carrier providing telephone voice transmission services shall provide, not later than July 26, 1993, in compliance with the regulations prescribed therein, throughout the area in which it offers services, telecommunications relay services, individually, through designees, through a competitively selected vendor, or in concert with other carriers.</p> <p>Speech-to-speech relay service shall be provided by March 1, 2001.</p> <p>Interstate Spanish language relay service shall be provided by March 1, 2001.</p> <p>In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.</p>	<p>The Communications Act defines TRS as "telephone transmission services that provide the ability for an individual who has hearing or speech impairment to engage in communication by wire or radio with a hearing individual in a manner that is functionally equivalent to the ability of an individual who does not have a hearing impairment or speech impairment to communicate using voice communication services by wire or radio." Since TRS calls handled via captioned telephone VCO service fall squarely within this definition - i.e. they allow communications between persons with hearing or speech disabilities and persons without such disabilities - we conclude that captioned telephone VCO service falls within statutory definition of TRS. (¶7)</p>	<p>Sprint has been a <i>CapTel</i> provider, on trial basis, since May 1, 2002. On January 1, 2004, Sprint successfully converted <i>CapTel</i> trial into a FCC-complaint <i>CapTel</i> service, first -ever in the TRS Industry.</p> <p>Speech-to-speech relay service for <i>CapTel</i> is waived by FCC. See Section 64.604 A.3.</p> <p>Sprint is also the first <i>CapTel</i> provider to offer intrastate and interstate Spanish services on January 1, 2004.</p> <p>Sprint is able to process inbound 711 calls to include access to <i>CapTel</i> services.</p>



FCC 03-112 Attachment D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Operational Standards			
§ 64.604 A.1	Communications Assistant (CA) Competency Skills	Requirement applies.	Sprint requires that all <i>CapTel</i> CAs have a high school graduate equivalency as a minimum qualification for the job.
	CAs are to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.	Use of <i>CapTel</i> 's voice recognition software "is a permissible means ...for achieving the CA's competency skills required by the TRS mandatory minimum standards" (§139).	All <i>CapTel</i> CAs are tested and competent in typing, grammar, and spelling to ensure skills meet the following FCC Guidelines. <i>CapTel</i> CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures.
	CAs must have competent skills in typing, grammar, spelling, and interpretation of typewritten ASL, familiarity with hearing and speech disability cultures, languages, and etiquette.	Waived. Interpreting typed ASL is not applicable.	A captioned telephone user does not type in making a call, therefore is never the opportunity for the CA to have to interpret typewritten ASL
	Typing Speed - 60 WPM with technological aids	Use of voice recognition technology in the provision of <i>CapTel</i> VCO service "is a permissible means for ... enhancing transmission speed..." (§139)	<i>CapTel</i> 's voice recognition technology transmits above 100 WPM.
	Oral-to-type tests	Waived. Permits use of Oral-to-text tests instead.	Oral to text tests are given to all <i>CapTel</i> CAs
§ 64.604 A.2	Confidentiality & Conversation Context	Requirement applies.	<i>CapTel</i> CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided.
	CAs are prohibited from disclosing the content of any relayed conversation regardless of content.	Requirement applies.	<i>CapTel</i> CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.
	CAs are prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise.		

FCC 03-112 Attachment D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p>§ 64.604 A.3</p>	<p>Types of Calls</p> <p>CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.</p> <p>TRS shall be capable of handling any type of call normally provided by common carriers and can decline calls if credit card authorization is denied.</p>	<p>Waived for outbound calls (§ 46) because the <i>CapTel</i> CA is not involved in call set up and cannot refuse the call (§46)</p> <p>Not waived for inbound calls to a <i>CapTel</i> user made through a TRS facility. However, if call is made directly to the captioned telephone access number no set up is involved and the <i>CapTel</i> CA cannot refuse to call (§46).</p> <p>Requirement applies.</p> <p>Note: The requirement to provide 711 dialing is waived for outbound calls made from a <i>CapTel</i> phone. Inbound 711 calling waived for one year (8/1/03 - 7/31/04).</p> <p>Also STS and HCO are waived (§29).</p>	<p><i>CapTel</i> users dial sequential calls directly therefore there is no way for a <i>CapTel</i> CA to refuse sequential calls or limit length of calls.</p> <p><i>CapTel</i> will not refuse single or sequential inbound calls or limit the length of calls utilizing the service. If an inbound call is made to a captioned telephone user via the captioned telephone access number, set-up is automatic, and thus there is no way for a CA to refuse the call.</p> <p><i>CapTel</i> is capable of handling all call types normally provided by common carriers.</p>
<p>§ 64.604 A.4</p>	<p>Handling of Emergency Calls</p> <p>Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to the nearest PSAP.</p> <p>A CA must pass along the caller's number to the PSAP when a caller disconnects before being connected to emergency services.</p>	<p>Requirement applies.</p> <p>Requirement applies.</p>	<p><i>CapTel</i> user dials 9-1-1. Sprint will route the call <u>directly</u> to the most appropriate PSAP.</p> <p>The 911 PSAP center will receive the caller's Automated Number Identification and Automated Locator Identification. If the call is disconnected, the 911 center will call the <i>CapTel</i> user back.</p>

FCC 03-112 Attachment D Final Rules		FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.604 A.5	In-call Replacement of CAs  CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of 10 minutes.		Requirement applies.	<i>CapTel</i> CAs stay on all calls for a minimum of 10 minutes.
§ 64.604 A.6	CA Gender Preferences  TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.		Waived. (§ 36, 47-48).	
§ 64.604 A.7	STS Called Numbers  STS users must be provided the option to maintain a list of names and phone numbers that the STS user calls. When the STS user requests one of these names, the CA must repeat it and state the phone number to the STS user.  This information must be transferred to any new provider.		Waived. (§29)	
Technical Standards				
§ 64.604 B.1	ASCII & Baudot  TRS shall be capable of communicating with ASCII & Baudot format at any speed generally in use.		Waived. (§53-54)	

FCC 03-112 Attachment D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.604 B.2	<p>Speed of Answer</p> <p>TRS shall include adequate staffing to ensure 85% of all calls answered within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold.</p> <p>Abandoned calls shall be included in the speed-of-answer calculation.</p> <p>Speed of Answer is to be measured on a daily basis.</p> <p>The system shall be designed to a P.01 standard.</p>	<p>Requirement applies</p> <p>Requirement applies.</p> <p>Requirement applies.</p>	<p>Sprint <i>CapTel</i> ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold.</p> <p>Abandoned calls are included in the speed-of-answer calculation.</p> <p>Sprint <i>CapTel</i> system is designed to a P.01 standard or greater measured on a daily basis.</p>
§ 64.604 B.3	<p>Equal Access to IXC's</p> <p>TRS users shall have access to their chosen IXC carrier through the TRS and to all other operator services, to the same extent that such access is provided to voice users.</p>	<p>Requirement applies.</p>	<p><i>CapTel</i> users will be able to choose their IXC carrier through the <i>CapTel</i> Carrier of Choice program allowing for the same access that is provided to voice users.</p>

FCC 03-112 Attachment D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.604 B.4	<p>TRS Facilities</p> <p>TRS shall operate everyday, 24 hours a day.</p> <p>TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.</p> <p>Adequate network facilities shall be used in conjunction with TRS.</p>	<p>FCC noted that <i>CapTel</i> is not a mandated service but stated that <i>CapTel</i> is a form of enhanced VCO service. It allowed interstate reimbursement from the Interstate TRS Fund. For a provider to be eligible for reimbursement from the Interstate TRS Fund for the provision of TRS, the provider must either meet the mandatory minimum standards or request and receive waivers of the standards. (§ 22, 24)</p> <p>State TRS programs, of course, are free to offer this service and to reimburse providers of intrastate captioned telephone VCO service. (§ 22).</p>	<p>Sprint <i>CapTel</i> is available 24 hours a day, everyday.</p> <p>Sprint <i>CapTel</i> has redundancy features that provide functional equivalency, including uninterruptible power for emergency use.</p> <p>Sprint <i>CapTel</i> network facilities are sufficient to ensure that the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience.</p>
§ 64.604 B.5	<p>Technology</p> <p>No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecomm to people with disabilities.</p> <p>VCO &amp; HCO technology are required to be standard features of TRS.</p>	<p>FCC acknowledged that <i>CapTel</i> is an enhanced VCO service of TRS (§ 44).</p> <p>Waived for HCO. (§ 29)</p>	<p>Sprint is the nation's leader in the development and offering of technological features for TRS.</p>

FCC 03-112 Attachment D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p>§ 64.604 B.6</p>	<p>Voicemail &amp; Interactive Menus</p> <p>CAs must alert the TRS user to the presence of a recorded message &amp; interactive menu thru a hot key on the CA's terminal.</p> <p>TRS providers shall electronically capture recorded messages &amp; retain them for the length of the call, &amp; may not impose any charges for additional calls that must be made by the user in order to complete calls involving recorded or interactive messages.</p> <p>TRS will handle pay-per-calls.</p>	<p>Requirement applies.</p> <p>Requirement applies.</p>	<p><i>CapTel</i> user both hears and interacts directly with the recorded message and makes the selections as requested by the interactive menu. The <i>CapTel</i> user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.</p> <p><i>CapTel</i> users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The <i>CapTel</i> user interacts with the recorded message system directly. This is treated as one call.</p> <p>Sprint <i>CapTel</i> supports pay-per-call call types.</p>
Functional Standards			

FCC 03-112 Attachment D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.604 C.1	<p>Consumer Complaint Logs</p> <p>States must maintain a log of complaints including all complaints about TRS to include minimum include the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution.</p> <p>States &amp; TRS providers shall submit to the FCC by July 1 of each year, summaries of logs indicating the number of complaints received for the 12-month period ending May 31.</p>	Requirement applies.	<p>Sprint <i>CapTel</i> maintains a log of all complaints. The log includes all of the required fields including the date, the nature, the date of resolution, and the explanation of resolution.</p> <p>Sprint <i>CapTel</i> provides summaries of the logs, which indicate the number of complaints received for a 12-month period ending May 31<sup>st</sup>.</p>
§ 64.604 C.2	<p>Contact Persons</p> <p>States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS.</p>	Requirement applies.	Sprint <i>CapTel</i> provides full support, including a primary point-of-contact, to contract administrators to meet FCC requirements.
§ 64.604 C.3	<p>Public Access to Info</p> <p>Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions, in phone directories, DA services, &amp; incorporation of TTY numbers in phone directories, shall assure that callers are aware of all forms of TRS.</p> <p>Conduct ongoing education and outreach programs to publicize availability of 711 access.</p>	Requirement applies.	Sprint follows all FCC requirements for public access to information and publishes in directories, brochures and billing inserts, instructions for TRS including 711 access in phone directories, DA services and the incorporation of TTY numbers in phone directories to assure that callers are aware of all forms of TRS.

FCC 03-112 Attachment D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.604 C.4	<p>Rates</p> <p>TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.</p>	Requirement applies.	<p><i>CapTel</i> users pay rates no greater than the rates paid for functionally equivalent voice communication services.</p>
§ 64.604 C.5	<p>Jurisdictional Separation of Costs</p> <p>(i) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for in the Commission's regulations</p> <p>(ii) Cost recovery, Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism</p> <p>(iii) Telecommunications Relay Services Fund – To be administered by the National Exchange Carrier Association, Inc. (NECA)</p>	Requirement applies.	<p>(i) Sprint follows FCC requirements in the jurisdictional separation of costs.</p> <p>(ii) Interstate <i>CapTel</i> is recovered from all subscribers of interstate services</p> <p>(iii) Sprint works with NECA for reimbursement of interstate minutes.</p>



FCC 03-112 Attachment D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.604 C.6	<p>Complaints</p> <p>(i) Referral of complaint,</p> <p>(ii) Intrastate complaint resolution,</p> <p>(iii) Jurisdiction of Commission,</p> <p>(iv) Interstate complaint resolution,</p> <p>(v) Complaint Procedures</p>	Requirement applies.	The Sprint <i>CapTel</i> Customer Contact process is fully compliant with all FCC Requirements.
§ 64.604 C.7	<p>Treatment of TRS Customer Info</p> <p>Future contacts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service, and shall not be sold, distributed, shared or revealed in any other way by the relay provider or its employees, unless compelled to do so by lawful order.</p>	Requirement applies.	Sprint transfers <i>CapTel</i> customer data to incoming <i>CapTel</i> vendors. Customer information that is normally contained in a TRS profile is not required for <i>CapTel</i> as the CA is anonymous to the call and the <i>CapTel</i> user talks directly to the called party. The data is provided in usable form at least 60 days prior to the last day of service and is not sold, distributed, shared or revealed in any other way by Sprint, or Sprint employees unless Sprint is compelled by legal process to provide such information.
§ 64.605	<p>State Certification</p> <p>Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to provide TRS.</p>	Requirement applies.	Sprint provides each Sprint TRS state a re-certification packet and assists in the re-certification process.

FCC 03-112 Attachment D Final Rules		FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Availability of SS7 Technology to TRS Facilities	Concluded that if a TRS provider is able to transmit any calling party identifying information to the network, it must provide Caller ID service.	Requirement applies.	Sprint <i>CapTel</i> will have the capability to transmit the 10-digit number and will recognize the ID blocking indicators.  Sprint <i>CapTel</i> will deliver the SS7 technology on February 1, 2004.	
Types of Calls	Two Line VCO Two Line HCO HCO-to-TTY HCO-to-HCO VCO-to-TTY VCO-to-VCO	Minimum standards pertaining to HCO are waived.  VCO requirements still apply.	Sprint <i>CapTel</i> supports the VCO calling combinations.	
Handling of Emergency Calls	Concluded that TRS providers must use a system for incoming emergency TRS calls that at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point.	Requirement applies.	<i>CapTel</i> user dials 9-1-1. Sprint will route the call directly to the most appropriate PSAP.	
Answering Machine Retrieval	Concluded that the answering machine and voice mail retrieval are TRS features that must be provided to TRS users.  Answering machine retrieval through TRS is accomplished when the recipient of the message, the TRS user, calls the TRS facility and has the CA listen to the voice messages.	The requirement was not addressed in the Declaratory Ruling.	Answering machine and voicemail retrieval is provided by <i>CapTel</i> .  Answering machine retrieval through <i>CapTel</i> is accomplished when the <i>CapTel</i> facility caption the voice message to the <i>CapTel</i> users.	

FCC 03-112 Attachment D Final Rules		FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Call Release	<p>Concluded that call release is required under FCC's functional equivalency mandate.</p> <p>Call release allows a CA to set up a TTY-to-TTY call that once set up does not require the CA to relay the conversation. The feature allows CA to sign-off or be "released" from the telephone line without, triggering a disconnection between two TTY users, after the CA connects the originating TTY caller to the called party's TTY through e.g. a business switchboard.</p>	Waived. (¶ 52)		
Speed Dialing	<p>Concluded that speed dialing feature is required under FCC's equivalency mandate.</p> <p>Speed dialing allows users to manually store a list of telephone numbers with designated speed dialing codes in the TRS user's consumer profile.</p>	The requirement was not addressed in the Declaratory ruling.	<i>CapTel</i> telephones have the Speed Dial feature.	

FCC 03-112 Attachment D Final Rules	FCC Requirement	FCC <i>CapTel</i> Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Three-way Calling	<p>Concluded that three-way calling is required under FCC's functional equivalency mandate but did not specifically mandate the way such functionality had to provide.</p> <p>The FCC's Order imposing such requirement stated that "generally" three-way calling can be provided "in one of two ways " One way is for the TRS consumer to request that the CA set up the call with two other parties.</p> <p>The second way is to set up a three-way call is for TRS user to connect to two telephone lines at the same time from his or her premises by using the telephone's switch hook (or "flash") button.</p>	The requirement was not addressed in the Declaratory Ruling.	<p>Sprint <i>CapTel</i> users will be able to participate a three way call. Although the person using the captioned phone is unable to establish the three-way call, the called party will be able to do so by utilizing telephone switch hook (or "flash") button on his or her CPE. Thus, Sprint <i>CapTel</i> meets the requirement for three-way calling. (For One-Line <i>CapTel</i>.) For Two-Line <i>CapTel</i> either party can initiate a 3 way call should the user purchased this as a LEC option.</p> <p>Sprint <i>CapTel</i> users will be able to participate in a conference bridge to speak to three or more individuals.</p>

Attachment L: Sprint's Report to the FCC on VRS and IP Waivers

FCC Internet and Video Relay Service Annual Progress Report  
April 16, 2007

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
1. STS	Waived through 1/1/08	STS is not possible over the internet. Voice over IP (VoIP) <b>**REQUIRES**</b> Quality of Service. QoS means that all the associated data packets arrive in one contiguous stream and in order. In the "internet" world, there are many segments owned by multiple providers using dis-similar routers. Some support QoS, some do not. There is, at this time, no universal, cooperative methodology to address the internet deficiencies.	In research and development stage. Sprint is investigating and evaluating several VoIP to determine acceptable QoS levels to support STS calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived Indefinitely; No report required	NA	NA
2. Spanish Relay	NA	NA	NA	Compensable but non-mandated service.	NA	Sprint provides ASL to Spanish Video Relay Service.
3. Types of Calls	NA	NA	NA	Waived through 1/1/08	Voice over IP (VoIP) requires Quality of Service. QoS means that all the associated	We are currently providing two-line VCO and HCO controlled at

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					<p>data packets arrive in one contiguous stream and in order.</p> <p>In the "internet" world, there are many segments owned by multiple providers using dis-similar routers. Some support QoS, some do not. The internet cannot be controlled by any single user. There is, at this time, no universal, cooperative methodology to address the internet deficiencies.</p> <p>Sprint offers alternatives VCO and HCO solution by using second line (analog line) where the Video Interpreter asks for a second number to call back using three-way call feature. The procedure is similar to two-line VCO or HCO call.</p>	<p>the agent position using IP or ISDN inbound from Video user and outbound POT S to Video User and outbound POTS to Voice user. One line VCO and HCO began in 2005. This is limited to certain types of end user appliances that allow voice access through the broadband connection at end user equipment.</p>
4. Emergency Call Handling	Waived through 1/1/08	Internet Protocol network (IP network) does not support the Automated	Sprint implemented a "manual" (directory assistance	Waived through 1/1/07	Internet Protocol network (IP network) does not support the Automated	No additional information to submit beyond our recent

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
		Number Identification information for Internet or Video Relay Services. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to an appropriate PSAP.	lookup) process for 911 calls through Internet Relay. The technical challenge remains of tying an exact location to an IP address. No additional development has been made that would allow Internet Relay users to place 911 calls through Internet Relay.		Number Identification information for Internet or Video Relay Services. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to an appropriate PSAP.	submission to the FCC. Current options may restrict interoperability. An Emergency database is still in use today for subscribers who choose to register a profile; however, agents must verify the location of the caller, as the caller may not be at the same physical location as the profile indicates.
5. Speed of Answer	NA	NA	NA	1/1/07- 80% of all calls within 120 seconds (monthly).	Sprint is exceeding the 80/120 service level requirement that went into effect January 1, 2007.	Sprint will continue to meet the requirement measured on a monthly basis.
6. Equal Access to Interexchange Carrier	Waived Indefinitely; No report required	NA	NA	Waived through 1/1/08	The IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and without an ANI to charge back for tolls calls, Sprint cannot support equal access to	The technical challenge remains of tying an exact location to an IP address for VRS users. However, the very nature of the internet makes billing for toll calls obsolete.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					interexchange carrier features for Video Relay Service.	
7. Pay-per-call (900) Service	Waived through 1/1/08	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls.	The technical challenge remains of tying an exact location and billing of pay-per-call. No additional development has been made that would allow Internet Relay end users to be billed for pay-per-call services.	Waived through 1/1/08	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls.	The technical challenge remains of tying an exact location and billing of pay-per-call. No additional development has been made that would allow Video Relay end users to be billed for pay-per-call services.
8. Voice Carry Over (VCO) (one-line)	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Voice carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is currently providing two-line VCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POT S to Video User and outbound POTS to Voice user. One line VCO, released in 2005, is limited to certain types of end user appliances that allow voice access through the broadband



Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
						connection at end user equipment.
9. Hearing Carry Over (HCO) (one-line)	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Hearing carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is currently providing two-line HCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POT S to Video User and outbound POTS to Voice user. One line HCO, released in 2005, is limited to certain types of end user appliances that allow voice access through the broadband connection at end user equipment.
10. VCO – to - TTY	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or VCO as communication between internet and	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
			baudot protocols are not compatible.			because. the videoconferencing via internet or ISDN protocols are not compatible.
11. HCO – t o- TTY	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or HCO as communication between internet and baudot protocols are not compatible.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or ISDN protocols are not compatible.
12. VCO – to – VCO	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or VCO as communication between internet and baudot protocols are not	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
			compatible.			ISDN protocols are not compatible.
13. HCO – to – HCO	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or HCO as communication between internet and baudot protocols are not compatible.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or ISDN protocols are not compatible.
14. Call Release	Waived through 1/1/08	An Internet Relay caller utilizes IP data to place an inbound call. The Call operator connects the outbound dialing voice call utilizing Signaling System 7 (SS7). Since these two types of calls are not compatible, the call release feature is not technically feasible.	It is not technically feasible at this time to provide call release features with Internet Relay calls. However, Sprint will continue to investigate new developments to allow Internet Relay customers to use this feature.	Waived through 1/1/08	A VRS customer utilizes a video connection to make an inbound call. The VRS operator utilizes a voice channel (SS7) to make an outbound dial. Because the two types of calls are not compatible, the call release feature is not technically feasible. Also, in the VRS environment, we are currently unable to remove the Video Interpreter	It is not technically feasible at this time to provide call release features with Video Relay calls. However, Sprint will continue to investigate new developments to allow Video Relay customers to use this feature.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					agent from the middle of the call when the inbound video caller reaches an outbound customer who also has video capability.	
15. 3-way Calling	Waived through 1/1/08	The current Internet Relay call environment does not support the capability to perform three-way calling initiated call from agent via Sprint IP.	It is possible for the customer to initiate a three-way call if he/she has conference calling capability. In this case, the operator does not needed to perform the three-way calling function. However, the limitation is that Sprint's Internet Relay Service will handle only one TTY user (and unlimited number of voice users) when using three-way calling via relay service. It is possible to have 2-Line VCO via Sprint IP using user-initiated three-way calling.	Waived through 1/1/08	At this time, it is not technically feasible to provide a 3-way Video Relay call. Customers using VRS do not have the web-enabled ability to initiate 3-way video calls because of the limitations of end user equipment. Features of customer premise equipment are not under the control of the VRS provider, and therefore the VRS provider cannot control the establishment of a three-way call.	The voice customer is currently able to use the LEC-provided three-way calling feature. One or two of the three legs of the call can be engaged as they would without VRS being a part of the call. VRS is transparent to this process. The VRS agent who receives an inbound video connection has the ability to out dial to multiple voice parties to create a three-way call of which two parts are voice and one part is video. The VRS agent platform is however, unable to support a three way call

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
						between two video customers and one voice user at this time.
16. Speed Dialing	Waived through 1/1/08	Sprint's current Speed Dial system is supported by ANI driven customer profile. Without being able to identify the customer's ANI, Sprint is not able to access the preferred speed dial list.	Customers can maintain their own speed dial list on their computer and paste the phone number on the web prior to the call. The phone number will be pre-populated to agent's dialing window for efficient call processing.	Waived through 1/1/08	This service is currently available for VRS customers who choose to use our webcam based product. They can create a speed dial list online and greatly improve the efficiency and connect time with the outbound party through the Video Interpreter. Individuals using TV-based videophones do not have this web enabled ability to speed dial through VRS because of the limitations of this type of end user equipment. Features of customer premise equipment are beyond the control of the VRS provider and determine how the customer can interact with Sprint's platform.	Individuals using TV-based videophones do not have this web-enabled ability to speed dial through VRS because of the limitations of this type of end user equipment. Features of customer premise equipment are beyond the control of the VRS provider and determine how the customer can interact with Sprint's platform.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
17. Providing Service 24/7	NA	NA	NA	NA	NA	NA

## Attachment M: Sprint Relay Fact Sheet

### Sprint Relay

[www.sprintrelay.com](http://www.sprintrelay.com)

Sprint is the leading provider of relay services in the United States so that those who are deaf and hard of hearing can have anytime, anywhere communications. With 16 years of experience in providing Telecommunications Relay Services (TRS), Sprint is the relay service provider for 31 states plus the Commonwealth of Puerto Rico, New Zealand and the federal government. Sprint has been awarded the following state TRS contracts:

Alabama	Indiana	New Mexico	Texas
Alaska	Illinois	New York	Utah
Arkansas	Massachusetts	North Carolina	Vermont
California	Minnesota	North Dakota	Washington
Colorado	Mississippi	Ohio	
Connecticut	Missouri	Oklahoma	
Delaware	Nevada	Oregon	
Florida	New Hampshire	South Carolina	
Hawaii	New Jersey	South Dakota	

TRS enables standard voice telephone users to talk to people who are Deaf, Hard of Hearing or Speech-disabled on the telephone. Under Title IV of the Americans with Disabilities Act, all telephone companies must provide free relay services either directly or through state programs throughout the 50 states, the District of Columbia, Puerto Rico and all of the U.S. territories. Sprint Relay's experience in the field provides the assurance that all services delivered will meet or exceed Federal Communications Commission mandates for TRS.

### Sprint Relay Services

**Traditional relay services** involve a relay operator serving as an intermediary for phone calls between a deaf, hard of hearing and speech-disabled user and a hearing party. The TRS operator speaks words typed by a deaf user on a text telephone (TTY) or via the Internet and relays the hearing person's spoken response by typing back to the deaf user.

#### **Emerging Technology:**

Under the Americans with Disabilities, all telephone companies are required to pay a percentage of the money that they collect from their subscribers into a national telecommunications relay services fund. This interstate fund is administered by NECA (National Exchange Carriers Association).

Currently, two technologies are funded through NECA – video and Internet relay services. There is strong competition in the TRS industry due to the fact that no state contract is required in any state to process calls through the Internet.

**Video relay services (VRS)** provides American Sign Language (ASL) users with an attractive alternative that offers them the opportunity to communicate by video conferencing using ASL their native language, which may be preferred over the traditional TTY relay service. VRS requires users to have a personal computer or television monitor, a Web camera or videophone and high-

speed Internet connectivity such as cable and DSL. Sprint Video Relay, powered by CSD (Communication Services for the Deaf), is a free service through the Internet that enables the deaf or hard of hearing user to communicate in ASL to a hearing or standard telephone user. Sprint Relay and CSD launched the first nationwide Video Relay Service in May 2002. To connect with a video interpreter, visit [www.sprintvrs.com](http://www.sprintvrs.com).

**Sprint IP Relay** is also a free service that combines TRS with the ease and ubiquity of the Internet, allowing users to make calls from any PC or selected Web-enabled Internet wireless devices without having to use traditional TTY equipment. Sprint IP Relay users also have the flexibility of using AOL Instant Messenger to access Sprint IP Relay. To connect using a website, go to [www.sprintip.com](http://www.sprintip.com). To connect using AOL Instant Messenger, send a 10-digit number to the screen name **SprintIP**. Both access methods will connect the caller to an experienced Sprint Relay operator.

**Sprint IP Wireless Relay** is a new service that allows customers who are deaf, hard-of-hearing or who have a speech disability to use wireless relay services on a select number of wireless devices:

- 1) BlackBerry phones (with an operating system 4.0 or higher). Customers can use this service to communicate with any standard or mobile telephone user in the United States via a free downloadable application at [www.sprintrelay.com/download/](http://www.sprintrelay.com/download/). Users simply select a contact from their address book or enter a phone number with accompanying text instructions to a Sprint IP Relay Operator.
- 2) PPC6700 devices – To download the free Sprint IP Wireless application, go to: [www.sprintrelay.com/download/treo](http://www.sprintrelay.com/download/treo).

Sprint IP Wireless allows users to have the mobility to make a relay call when they need to without a TTY or computer and can be assured the connection is with an experienced Sprint Relay operator.

**CapTel<sup>SM</sup>** (Captioned Telephone) relay service is a leading-edge technology developed by Ultratec, Inc. of Madison, Wis., that allows people to receive both voice and text captioning, nearly simultaneously. A special, *CapTel*-equipped phone is required in order to place a call through the *CapTel* relay service. The *CapTel* phone works like any traditional phone with callers talking and listening to each other, but with one very significant difference – captions are provided live for every call. The captions are displayed on the *CapTel* phone's built-in screen so the user can read the words while listening to the voice of the other party. For more information on *CapTel*, visit [www.captionedtelephone.com](http://www.captionedtelephone.com).

**Relay Conference Captioning<sup>SM</sup>**, developed by Caption Colorado, combines real-time captioning and standard relay service to provide relay conference captioning calls for deaf and hard-of-hearing individuals (in participating Sprint Relay state programs). By using an Internet Text Streaming platform supported by skilled Captionists, RCC provides highly accurate real-time captioned text for any live conference call.

For more information, please visit [www.sprintrelay.com](http://www.sprintrelay.com)



## **Attachment N: Copy of TSP Press Release**

### **Media Contact:**

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General Press Release

### **Sprint Completes Voluntary Telecommunications Services Priority Program Enrollment for Relay Network**

**OVERLAND PARK, Kan. – November xx, 2005** – Sprint (NYSE: S) today announces that it has completed the final milestone in enrolling Sprint's telecommunications relay service (TRS) in the FCC's Telecommunications Service Priority (TSP) Program. Sprint TRS, communications services available for individuals who are deaf, hard of hearing or have a speech disability, is comprised of a network of call centers geographically disbursed throughout the United States.

Effective October 31, 2005, all 14 Sprint Relay call centers were successfully activated under the TSP Program. Unlike other TRS providers, Sprint's TRS network is designed to reroute traffic to other Sprint Relay centers across the country to continue uninterrupted service with minimal customer impact.

"In less than five months, we were able to complete the implementation of the FCC's TSP program," said Mike Ligas, director of Sprint Relay. "Sprint is dedicated to providing effective communications services for individuals who are deaf or hard of hearing and we recognized the urgency to ensure reliable communications during emergency situations."

In 1988, TSP program was established to prioritize the restoration of telephone service to critical facilities and agencies at times when telecommunications companies are typically overburdened with service requests, such as after a natural disaster. In the event of a regional or national crisis, the program restores telephone services most critical to national and homeland security on a priority basis.

### **Sprint Relay Portfolio of Services**

Sprint has 15 years of experience in providing relay services to persons who are deaf, hard of hearing or deaf-blind or who have a speech disability to communicate with hearing persons on the phone. Sprint offers relay services through an intelligent platform to the federal government, 30 states, the Commonwealth of Puerto Rico and New Zealand. Sprint's experience in the field provides the assurance that all Sprint Relay services will meet or exceed Federal Communications Commission requirements for telecommunications relay services (TRS). Relay service is available 24 hours a day, 365 days a year, with no restrictions on the number of calls placed or call length. For more information, visit [www.sprintrelay.com](http://www.sprintrelay.com).

Sprint Government Systems Division ([www.sprint.com/government](http://www.sprint.com/government)) is based in Reston, Va., and offers the full range of Sprint product and service offerings for federal and state government customers.

### **About Sprint Nextel**

Sprint Nextel offers a comprehensive range of wireless and wireline communications services to consumer, business and government customers. Sprint Nextel is widely recognized for developing, engineering and deploying innovative technologies, including two robust wireless networks offering industry leading mobile data services; instant national and international walkie-talkie capabilities; and an award-winning and global Tier 1 Internet backbone. For more information, visit [www.sprint.com](http://www.sprint.com).